

**RCRA HAZARDOUS WASTE GENERATOR
COMPLIANCE EVALUATION INSPECTION CHECKLIST**

Facility: EKCO HOUSEWARES, INC
USEPA I.D.: OH0 045 205 424
Street: 359 STATE AVE., NW
City: MASSILLON State: OH Zip: 44648
County: STARK Telephone: (216) 832-5024
Owner/Operator: EKCO Group
Street: 9234 W. Belmont Ave
City: Franklin Park State: IL Zip: 60131
Telephone: _____ Fax: _____
Inspection Date: 11/18/93 Time: 9:35
Advance notice of inspection given? (yes) _____ (no) ☒
If so, how far in advance? _____

| | <u>Name</u> | <u>Agency/Title</u> | <u>Phone</u> |
|--------------------------|-----------------------|----------------------|-----------------------|
| Inspectors: | <u>KAREN L NESBIT</u> | <u>OEPA/ESPEC II</u> | <u>(216) 963-1200</u> |
| | <u>NANCY ZIKMANIS</u> | <u>↓</u> | <u>↓</u> |
| Facility Representative: | <u>JEFF BORMAN</u> | | <u>(216) 832-5024</u> |
| | <u>PAUL DENTZ</u> | <u>QC/Env</u> | <u>↓</u> |

STATUS

Cond. Exempt SQG _____ SQG _____ Large Quantity Generator ☒
LDR Checklist Attached: (yes) ☒ (no) _____

NOTE: LDR requirements are not applicable to CESQGs.

ACTIVITIES

Containers ☒
Tanks _____
Wastepile _____
Landfill _____
Surface Impoundment ☒

Used oil burner _____
Hazardous waste fuel burner/blender _____
Incineration/Thermal treatment _____
Land treatment _____
Groundwater monitoring ☒ - not evaluated

REMARKS - GENERAL INFORMATION

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling procedures:

Exco generates silicon coated bakeware

They generate

- ① F001 - still bottom wastes
- ② D001, F003, F005 - Paint booth sludges
- ③ D001 - chlorinated scrap batch mixer
- ④ F003, F005 - Paint booth water
- ⑤ F003, F005, D001 - Paint booth floor
- ⑥ D001, F005 - silicon paint waste
- ⑦ D001, D018, D039 - SK part washer
- ⑧ F001, D040 - degreaser

All wastes are shipped to permitted TSD's

- Exco is ^{attempting to} eliminating all chlorinated solvents from their process.

The facility is currently implementing closure of the hazardous waste surface impoundment

1. Are hazardous wastes stored in containers which are:

a. Closed? [3745-66-73(A)]

Y _____

b. In good condition? [3745-66-71]

Y _____

c. Compatible with wastes stored in them? [3745-66-72]

Y _____

2. Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)]

Y _____

3. Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)]

N _____

Wall near
Tote at South
paint room
showed signs
of past
mismanagement

4. Is the area where containers are stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74]

Y _____

5. Is the facility recording inspections described in Question #4 in an inspection log or inspection summary as required by OAC 3745-66-74(B) which contains the following information:

a. Date and time of inspections?

Y _____

b. Name of inspector?

Y _____

c. Notation of observations made during the inspection?

Y _____

d. The date and nature of any repairs or other remedial action?

Y _____

6. Are ignitable and/or reactive hazardous waste(s) being managed at the facility? If so,

Y _____

a. Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]

Y _____

b. Are containers holding hazardous wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)]

Y _____

NOTE: Small Quantity Generators are not required to comply with OAC Rule 3745-66-67 (except for wastes being accumulated in satellite accumulation areas). [See OAC Rules 3745-52-34(D) (2) and (C) (1) (a)]

GENERATOR ACCUMULATION IN CONTAINERS AND TANKS
(OAC 3745-52-34)

Y/N/NA RMK #

1. If the generator elects to accumulate hazardous waste on-site in containers or tanks for 90 days or less without a permit as provided under 3745-52-34, are the following requirements met:

- a. The containers or tanks are clearly marked with the words "Hazardous Waste?" [3745-52-34(A)(3)]
- b. The date that accumulation began is clearly marked on each container? [3745-52-34(A)(2)]

N

Y

In addition, OAC 3745-52-34(A)(1) also requires generators accumulating hazardous waste(s) in containers < 90 days to comply with the "Container Management" Rules of OAC 3745-66-70 to 3745-66-77. If the generator is accumulating hazardous waste(s) in containers, please complete Management of Containers checklist to document compliance with these requirements.

2. Is the generator accumulating hazardous waste(s) in tanks?

N

If so, OAC 3745-52-34(A)(1) requires generators to comply with rules 3745-66-90 to 3745-66-992 except paragraph (C) of rule 3745-66-97 and rule 3745-66-991.

If the generator is accumulating hazardous waste(s) in tanks, complete the Tank System Requirements checklist to document compliance with these requirements.

3. Has the generator accumulated hazardous wastes in excess of ninety (90) days?

N

- a. If so, has the generator been granted an extension by the Director for accumulation in excess of (90) days?

NA

REMARKS - GENERATOR ACCUMULATION REQUIREMENTS

OAC 3745-52 - LARGE QUANTITY GENERATOR REQUIREMENTS

WASTE EVALUATION (OAC 3745-52-11)

Y/N/NA RMK #

1. Have wastes generated at the facility been evaluated in compliance with the waste evaluation requirements of OAC rule 3745-52-11(A) (B) and (C)?

Y #1

- (a) Has the generator's evaluation identified in Question #1 included an evaluation for the (TC) Toxicity Characteristics identified in 3745-51-24? [3745-52-11(C)]

Y _____

NOTE: The TC rule requirement noted above must include an evaluation of the metal as well as organic TC constituents identified in 3745-51-24.

If not, specify those waste streams which the generator has failed to adequately evaluate:

Paint sludge, booth floors - being reevaluated due to process change
- Degreasers being ~~plus~~ replaced
#1 - Analysis being done currently to reevaluate waste streams - now using all codes in case of mixing

2. Are any wastes generated at the facility identified by the generator as being excluded from regulation under Rule 3745-51-04?

Y _____

If so, specify those waste streams identified by the generator as being excluded under 3745-51-04:

- Scrap metal - reclaimed
- rags & gloves - laundered
- cardboard recycled

3. Is the facility generating any wastes which are identified as recyclable materials as defined in OAC 3745-51-06(A)?

If so, please identify these waste streams below:

GENERATOR CLASSIFICATION (OAC 3745-52-34)

Does the facility:

1. Generate < 100 Kg (25-30 gallons) of hazardous waste in a calendar month?

(yes) _____ (no) ✓

If so, the facility is classified as a Conditionally Exempt Small Quantity Generator, unless 3.b. applies. Please complete the Conditionally Exempt Small Quantity Generator Requirements checklist.

2. Generate between 100 and 1000 Kg of hazardous waste in a calendar month? (about 25 to under 300 gallons)

(yes) _____ (no) ✓

If so, the facility is classified as a Small Quantity Generator, unless 3.b. applies. Please stop here and complete the Small Quantity Generator Requirements checklist.

3. a. Generate > 1000 Kg (~ 300 gallons) of hazardous waste in a calendar month?

(yes) _____ (no) ✓

or;

- b. Generate > 1 Kg of acutely hazardous waste in a calendar month?

(yes) ✓ (no) _____

If so, the facility is classified as a Large Quantity Generator. Please complete the Large Quantity Generator Requirements checklist.

REMARKS - GENERATOR CLASSIFICATION

4. In accordance with OAC rule 3745-51-02(E), is the generator recycling any materials on-site by:
- a. Using or reusing the material as an ingredient in an industrial process to make a product?
 - i. If so, is the material being reclaimed before it is used or reused?
 - b. Using the material as a substitute for commercial products?
 - c. Returning the material to the original process from which it was generated as a substitute for a raw material feedstock?
 - i. If so, is the material reclaimed before returning to the original process?

| | |
|---|--|
| Y | |
| Y | |
| Y | |
| Y | |
| Y | |

NOTE: The materials identified in Question #4 may not be considered wastes if recycled as described above, unless the conditions identified in Questions 4(a) (i) or 4(c) (i) are true. See O.A.C. Rule 3745-51-02(E).

Please identify those materials that the generator is recycling as described in 4.a., 4.b. and/or 4.c. below:

*used dry paint being ~~not~~ reclaimed & put back in process
reducing purchase of resin by 34%*

5. Has the generator identified any waste treatment activity as being excluded from regulation because of totally enclosed treatment or via operation of an elementary neutralization unit and/or wastewater treatment unit as described in Rule 3745-65-01?

N

If so, specify those waste treatment activities which the generator has identified as being excluded from regulation:

GENERATOR IDENTIFICATION NUMBER (OAC 3745-52-12)

6. Prior to treating, storing, disposing, transporting or offering to transport hazardous waste, has the generator obtained a generator identification number from US EPA or Ohio EPA as required by 3745-52-12?

Y

GENERATOR ANNUAL REPORT (OAC 3745-52-41)

7. Has the generator filed annual reports to the Director on or before March 1st of each calendar year as required by 3745-52-41?

Y

HAZARDOUS WASTE IMPORT/EXPORT (OAC 3745-52-50 TO 3745-52-57
AND OAC 3745-52-60)

Y/N/NA RMK #

8. Does the generator import or export hazardous waste?

N _____

If so, are the wastes handled in accordance with the
requirements of 3745-52-50 through 3745-52-57 and
3745-52-60?

NA _____

REMARKS - HAZARDOUS WASTE IMPORT/EXPORT

PRE-TRANSPORT REQUIREMENTS (OAC 3745-52-30 TO 3745-52-33)

9. Does the generator meet the following pre-transport
requirements prior to offering hazardous wastes for
transport off-site:

a. The waste material is packaged, labeled, and marked
in accordance with the applicable DOT regulations
[3745-52-30, 3745-52-31, and 3745-52-32(A)]?

Y _____

b. Each container with a capacity of 110 gallons or less
is affixed with a completed hazardous waste label as
required by 3745-52-32(B)?

Y _____

c. Before transporting hazardous wastes off-site or
offering hazardous wastes for transportation off-
site, does the generator placard or offer the
appropriate DOT placards to the initial transporter
in compliance with 3745-52-33?

N _____

REMARKS - PRETRANSPORT REQUIREMENTS

GENERATOR CLOSURE REQUIREMENTS (3745-52-34)

Y/N/NA RMK #

1. Has the generator closed any < 90-day accumulation unit(s) since date of last inspection?

N/A *

If so, describe the unit(s) which the generator has closed:

2. If the generator has closed any < 90-day accumulation unit(s) as described in Question #1, was closure completed to meet the closure performance standard of 3745-66-11? [3745-52-34 (A) (1)]

N/A

Please provide a description of the type of documentation provided by the generator to confirm that closure was completed in accordance with the closure performance standard:

3. If the < 90 day unit closed was a tank system, did the generator also complete closure in accordance with the tank system closure requirements of 3745-66-97(A) and (B)? [3745-52-34 (A) (1)]

N/A

REMARKS - GENERATOR CLOSURE REQUIREMENTS

* - 2 potential generator closure units -

1 - ^{accum} storage unit inside - if don't use this winter needs closed

1 - still bottoms / degreaser ("Short-Term Only") acc. unit - once eliminate solvents from degreaser - will need to close accumulation area. (presently looking at aqueous cleaner).

MANIFEST REQUIREMENTS (OAC 3745-52-20 TO 3745-52-23)

Y/N/NA RMK #

1. Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:
 - a. All hazardous wastes shipped off-site have been accompanied by a completed manifest, USEPA form 8700-22 in compliance with 3745-52-20 (A)?
 - b. The manifest contains all information required by 3745-52-20 and the minimum number of copies required by 3745-52-22?
 - c. The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20 (C) (D) (E)?
 - d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23 (A) (1) (2)?
2. Has the generator received a return copy of each completed manifest within thirty-five (35) days of the date the waste was accepted by the initial transporter?
 - a. If not, has the generator complied with the manifest exception reporting requirements in 3745-52-42?

Y _____

Y _____

Y _____

Y _____

N _____

N/A _____

*Van Waters & Rogers
is Broker - Supplies
Facility with
Back-up TSDs*

NOTE: The manifest exception reporting requirement identified in Question #2 above is applicable to large quantity generators only. See Question #3 for manifest exception reporting requirements for small quantity generators.

3. If the generator is acting as a small quantity generator, (> 100 kg but < 1000 kg of hazardous waste in a calendar month) has the generator received a return copy of each completed manifest within sixty days of receipt by the initial transporter? [3745-52-42(B)]
 - a. If not, did the generator submit a legible copy of the manifest with some indication that the generator has not received confirmation of delivery to the Ohio EPA? [3745-52-42(B)]
4. Are signed copies of all hazardous waste manifests and any documentation required for Exception Reports retained for at least 3 years as required by 3745-52-40?

N/A _____

↓ _____

Y _____

PERSONNEL TRAINING (OAC 3745-65-16)

Y/N/NA RMK #

1. Does the generator provide a personnel training program in compliance with 3745-65-16(A) (B) (C) including instruction in safe equipment operation and emergency procedures, and implementation of the contingency plan? [3745-52-34(A) (4)]
2. Does the generator provide personnel training to new employees within 6 months after the date of employment as required by 3745-65-16(B)? [3745-52-34(A) (4)]
3. Does the generator provide an annual refresher training course as required by 3745-65-16(B)? [3745-52-34(A) (4)]
4. Does the generator keep all the records required by 3745-65-16(D) (E) including; written job titles, job descriptions and documented employee training records? [3745-52-34(A) (4)]

Y _____

Y _____

Y _____

Y _____

REMARKS - PERSONNEL TRAINING REQUIREMENTS

CONTINGENCY PLAN (OAC 3745-65-50 THROUGH 3745-65-56)

Y/N/NA RMK #

1. Does the o/o have a written contingency plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes which contains the following components: [3745-65-52 (A) (B) (C) (D) (E)]
 - a. Actions to be taken by personnel in the event of an emergency? Y
 - b. Arrangements or agreements with local or state emergency authorities? Y
 - c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator? Y
 - d. A list of all emergency equipment including location, physical description and outline of capabilities? Y
 - e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52 (F)]? Y
2. Is the contingency plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste or hazardous waste constituents to air, soil or surface water? [3745-65-51 (A)] Y
3. Is a copy of the contingency plan and any plan revisions maintained on-site and has the plan been submitted to all local and state emergency authorities that might be required to participate in execution of the plan? [3745-65-53 (A) (B)] Y
4. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] Y
5. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the contingency plan designated at all times (on-site or on-call)? [3745-65-55] Y
6. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the contingency plan and taken all of the actions and made all of the notifications necessary under 3745-65-56 (A-J)? NA

OAC 3745-67 SURFACE IMPOUNDMENTS

- currently undergoing approved
closure. Weston Associates -
consultants - Enreco-contraceptors

Y/N/NA RMK #

1. Is at least 2 feet (60 cm) of freeboard maintained in the surface impoundment, or has written certification that the impoundment is of adequate design been prepared? [3745-67-22]
2. Are earthen structural containment systems equipped with protective cover such as grass, shale or rock to minimize erosion from wind and water? [3745-67-23]
3. Is the level of freeboard in the surface impoundment inspected at least once each operating day? [3745-67-26(A)]
4. Is the structural containment system inspected at least once per week? [3745-67-26(B)]
5. Are the inspections noted in Question 4 and 5 documented? [3745-65-15(B) (4)]

NA

NA

NA

NA → Y

Y

log notes
RCRA Closure
activity

MANAGEMENT OF IGNITABLE/REACTIVE WASTE IN SURFACE IMPOUNDMENTS

6. Whenever a surface impoundment is used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the surface impoundment, has the facility insured the safety of such changes by: [3745-67-25]
 - a. Waste analyses and trial treatment? or:
 - b. Written documented information on similar treatment of similar waste under similar conditions?
7. With the exception of emergency situations, whenever ignitable or reactive wastes are placed in a surface impoundment, has the facility insured the safety of the operation by complying with the following: [3745-67-29 and 3745-65-17]
 - a. The waste is immediately treated after placement in the surface impoundment so that it is no longer hazardous?
 - b. The waste is managed to protect from ignition?
 - c. A certification from a qualified chemist or engineer is maintained at the facility stating that the design/operation of the unit will prevent ignition or reaction?

NA

8. Is the placement of incompatible waste materials in the same surface impoundment done in compliance with the safety requirements of 3745-65-17? [3745-67-30] NA
9. At closure, were all standing liquids, waste residues, liners, and contaminated soil removed from the unit? [3745-67-28]
10. Has the owner/operator retrofitted the surface impoundment or ceased receipt of hazardous waste by November 8, 1988?
- If no, did USEPA grant an exemption prior to that date?

NOTE: If the operator elects not to exempt the surface impoundment from further regulation by removing all waste materials, the surface impoundment is subject to the post-closure care and ground water monitoring requirements specified in 3745-68-10 and 3745-67-28(C).

REMARKS - SURFACE IMPOUNDMENT REQUIREMENTS

PREPAREDNESS AND PREVENTION (OAC 3745-65-30 TO 3745-65-37)

Y/N/NA RMK #

1. Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31]

W * See 3745-66-73(B)

2. Has there been a fire, explosion or non-planned release of waste at the facility since date of last inspection?

N

a. If yes, was the contingency plan implemented? [3745-65-51(B)]

NA

NOTE: Small quantity generators are not required to maintain a contingency plan. Question #2(a) is, therefore, not applicable to SQGs.

3. If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A) (B) (C) (D)]

a. Internal alarm system?

Y

b. Access to telephone, radio or other device for summoning emergency assistance?

Y

c. Portable fire control equipment, spill control and decontamination equipment?

Y

d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?

Y

4. Is all required spill control and decontamination equipment, fire and communications equipment tested on a weekly basis and maintained as necessary? [3745-65-33]

Y

a. Does the facility keep an equipment testing log required by 3745-65-33(B), including date and time of test, name of person conducting the test, observations made, and date and nature of any repairs?

Y

5. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34]

Y

6. If required due to the actual hazards associated with the waste, is adequate aisle space maintained to allow unobstructed movement of emergency or spill control equipment? [3745-65-35]

Y Concern *Short term storage will have made aisle space w/ addition of more drums

Y/N/NA RMK #

7. If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with possible hazards and facility layout? [3745-65-37(A)]
8. Where state and local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented? [3745-65-37(B)]

Fire Dept
Y M
NA

REMARKS - CONTINGENCY PLAN/PREPAREDNESS AND PREVENTION REQUIREMENTS

SATELLITE ACCUMULATION AREA REQUIREMENTS
(OAC 3745-52-34(C))

Y/N/NA RMK #

1. Has the facility elected to accumulate hazardous waste at or near a point of generation which is under the control of the operator of the process generating the waste? (defined as satellite accumulation)

Y _____

If so, are the following requirements of OAC 3745-52-34(C) being met:

- a. Quantities of waste accumulated do not exceed 55 gallons at any time?

Y _____

- b. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time?

NA _____

- c. The generator has marked the containers with words "Hazardous Waste" or with other words identifying the contents of the container?

N South Paint Room

If the facility is maintaining satellite accumulation areas as identified in 1.a. and 1.b. above, OAC 3745-52-34(C) also requires that the container(s) in these areas be managed in compliance with the "Container Management" requirements of OAC 3745-66-71, 3745-66-72, 3745-66-73(A), 3745-66-76 and 3745-66-77. Please complete the Use and Management of Containers checklist to document compliance with these requirements.

2. Is the facility accumulating hazardous waste(s) in excess of the amounts listed in either 1.a or 1.b?

Y _____

- a. If so, did the generator comply with 3745-52-34(A) within three (3) days? and;

N _____

- b. Upon accumulating > 55-gallons of waste, did the generator mark the container holding the excess hazardous waste with the date the excess began accumulating?

NA - Same date

REMARKS - SATELLITE ACCUMULATION REQUIREMENTS

CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS

WASTE EVALUATION (OAC 3745-52-11)

Y/N/NA RMK #

1. Have the wastes generated at this facility been evaluated as required under 3745-52-11(A) (B) and (C)?

NA

- (A) Has the generator's evaluation identified in Question #1 included an evaluation for the (TC) Toxicity Characteristics identified in 3745-51-24? [3745-52-11(C)]

NOTE: The TC Rule requirement noted above must include an evaluation of the metal as well as organic TC constituents identified in 3745-51-24.

If not, specify the waste(s) that the generator has failed to provide an adequate evaluation of:

GENERATOR CLASSIFICATION

2. Does the generator produce <100 kg of hazardous waste per month? (conditionally exempt SQG)
3. Does the conditionally exempt SQG generate acutely hazardous waste in quantities exceeding those specified in 3745-51-05(E) or 3745-51-05(F)? If so, complete the Large Quantity Generator Requirements checklist.
4. Do quantities of hazardous waste accumulated on-site at any one time exceed 1000 kg - or does the generator produce between 100 and 1000 kg of hazardous waste per month - (SQG)? If so, complete the Small Quantity Generator Requirements inspection checklist.

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

5. Does the conditionally exempt SQG ensure delivery of hazardous waste(s) to an off-site permitted TSD?

REMARKS - CESQG REQUIREMENTS

OAC CHAPTER 3745-59 - LDR GENERAL REQUIREMENTS

CASE-BY-CASE EXTENSIONS

Y/N/NA RMK#

1. Has the entity received an extension for compliance with land disposal restrictions from US EPA pursuant to 40 CFR 268.5? If yes,

N/A _____

(a) List the waste(s) affected:

(b) Has the extension been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-05(C)]

(c) When does the extension expire? _____

NOTE: A case-by-case extension can be granted for up to one year. The extension is renewable once (by US EPA) for an additional year. Until receiving approval of the extension by US EPA and recognition of the extension by the Director of Ohio EPA, the entity must continue to manage the waste in accordance with all applicable LDR requirements.

VARIANCE FROM A TREATMENT STANDARD

2. Has the entity been granted a variance from a treatment standard by US EPA pursuant to 40 CFR 268.44? If yes,

(a) List the waste(s) affected:

(b) Has the variance been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-44(C)]

NOTE: Until the variance has been approved by US EPA and recognized by the Director of Ohio EPA, the entity must continue to manage the waste in compliance with the LDR requirements.

NO MIGRATION PETITION

Y/N/NA

RMK#

3. Has the entity received a variance from US EPA to allow for continued land disposal of untreated LDR wastes based upon a demonstration that there will be no migration from the disposal unit pursuant to 40 CFR 268.6? If yes,

(a) List the waste(s) affected:

(b) Has the entity's "no migration" demonstration been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-06(C)]

NOTE: Until the no migration petition has been approved by US EPA and recognized by the Director of Ohio EPA, the entity must continue to manage the waste in compliance with the LDR requirements.

PROHIBITION AGAINST DILUTION

4. Does the entity dilute a restricted waste or a treatment residue from a restricted waste: [O.A.C. Rule 3745-59-03; 40 CFR 268.3]

(a) As a substitute for adequate treatment to achieve compliance with LDR treatment standards?

(b) To circumvent the effective date of a prohibition (e.g. to dilute a "non-wastewater" waste to a "wastewater" to avoid complying with the "non-wastewater" treatment standard)?

(c) To otherwise avoid a prohibition in O.A.C. Rules 3745-59-30 through 3745-59-35 (40 CFR 268.30 through 268.35)?

(d) To otherwise avoid a prohibition imposed by Section 3004 of RCRA?

NOTE: If the answer to any of the Questions 4(a) through 4(d) above is yes, the entity is impermissibly diluting a restricted waste and is in violation of O.A.C. Rule 3745-59-03 (40 CFR 268.3).

NOTE: Dilution of wastes is permissible under some conditions. See O.A.C. Rule 3745-59-03(B) (40 CFR 268.3) and the Third Third final rule preamble for additional information.

LDR - GENERATOR REQUIREMENTS

NOTE: The following requirements apply only to large quantity generators and small quantity generators. Conditionally exempt small quantity generators are exempt from land disposal restriction requirements as referenced in O.A.C. Rules 3745-59-01(E) (1) (40 CFR 268.1(e) (1)) and 3745-51-05(B) (40 CFR 261.5(b)).

EVALUATION OF WASTES/DETERMINING APPROPRIATE TREATMENT STANDARDS

Y/N/NA RMK#

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]

Y _____

(a) For determinations based solely on knowledge of the waste: Is supporting data used to make this determination being retained on-site? [O.A.C. Rule 3745-59-07(A) (5); 40 CFR 268.7(a) (5)]

Y _____

(b) For determinations based upon analytical testing: Is a copy of waste analysis data being retained on-site? [O.A.C. Rule 3745-59-07(A) (5); 40 CFR 268.7(a) (5)]

Y _____ *

2. Has the generator determined the correct "treatability group" for each waste restricted from land disposal (e.g. wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]

Y _____

3. Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]

Y _____

4. Does the entity generate any listed waste(s) which are restricted from land disposal? If so,

Y _____

(a) Do such wastes also exhibit hazardous waste characteristics as identified in O.A.C. Rules 3745-51-20 to 3745-52-24? (40 CFR 261.20 through 261.24)?

Y _____

(b) For listed wastes which also exhibit a characteristic: Does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [O.A.C. Rule 3745-59-09(A); 40 CFR 268.9(a)]

Y _____

The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g. a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See O.A.C. Rule 3745-59-09(B); 40 CFR 268.9(b)]

TREATMENT OF CHARACTERISTIC HAZARDOUS WASTE

Y/N/NA

RMK#

5. Does the generator treat characteristic hazardous waste(s) in a RCRA-exempt unit to render such wastes non-hazardous?

N _____

(a) If so, are treated waste(s) sent to a licensed solid waste disposal facility?

N/A _____

i. If so, with each shipment of waste, does the generator submit a notification and certification to the Regional Administrator/Director which contains the following:

a. Name and address of the facility receiving the waste? [O.A.C. Rule 3745-59-09 (D) (1) (a); 40 CFR 268.9 (d) (1) (i)]

b. A description of the waste as initially generated, including EPA hazardous waste numbers and treatability group? [O.A.C. Rule 3745-59-09 (D) (1) (b); 40 CFR 268.9 (d) (1) (ii)]

c. The treatment standards applicable to the waste at the initial point of generation? [O.A.C. Rule 3745-59-09 (D) (1) (c); 40 CFR 268.9 (d) (1) (iii)]

ii. Is the certification signed by an authorized representative and does it contain the language in O.A.C. Rule 3745-59-07 (B) (5) (a) (40 CFR 268.7 (b) (5) (i)? [O.A.C. Rule 3745-59-09 (D) (2); 40 CFR 268.9 (d) (2)]

NOTE: An example of a RCRA-exempt unit would include an elementary neutralization unit or a wastewater treatment unit as defined by O.A.C. Rule 3745-50-10. [See O.A.C. Rule 3745-65-01]

REMARKS

* will be re-evaluating both sludge & floors to determine if non-hazardous - new spray eliminated 13 solvents
CO₂ spray - only but ~~(one)~~ one solvent which is being converted (drop F-listing) - Last line - Nov 29 conversion
Degreasers - Jan 1, March 1 - converting each degreaser to aqueous solution.
- left with Partswasher waste & Silicone Paint Waste streams

NOTIFICATION/CERTIFICATION

Y/N/NA RMK#

6. For wastes that do not meet treatment standards: Does the generator notify the treatment/storage facility receiving the wastes, in writing, that wastes being received do not meet treatment standards? [O.A.C. Rule 3745-59-07(A) (1); 40 CFR 268.7(a) (1)]

Y

If so, does the notification include the following:

- (a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A) (1) (a); 40 CFR 268.7(a) (1) (i)]

Y

- (b) Appropriate treatment standard for the waste? [O.A.C. Rule 3745-59-07(A) (1) (b); 40 CFR 268.7(a) (1) (ii)]

Y

- (c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A) (1) (c); 40 CFR 268.7(a) (1) (iii)]

Y

- (d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A) (1) (d); 40 CFR 268.7(a) (1) (iv)]

Y

referenced in some LDR

7. Is the notification identified in Question #6 submitted with each shipment of waste? [O.A.C. Rule 3745-59-07(A) (1); 40 CFR 268.7(a) (1)]

Y

8. For wastes that meet treatment standards: Does the generator submit a written notice and certification to the treatment, storage or disposal facility receiving the wastes stating wastes being received meet applicable treatment standards? [O.A.C. Rule 3745-59-07(A) (2); 40 CFR 268.7(a) (2)]

N/A

If so, does the notice/certification include the following:

- (a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A) (2) (a) (i); 40 CFR 268.7(a) (2) (i) (A)]

- (b) The corresponding treatment standards and applicable prohibitions for the waste? [O.A.C. Rule 3745-59-07(A) (2) (a) (ii); 40 CFR 268.7(a) (2) (i) (B)]

- (c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A) (2) (a) (iii); 40 CFR 268.7(a) (2) (i) (C)]

- (d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A) (2) (a) (iv); 40 CFR 268.7(a) (2) (i) (D)]

- (e) Is the certification signed by the generator or an authorized representative? [O.A.C. Rule 3745-59-07(A) (2) (b); 40 CFR 268.7(a) (2) (ii)]

Y/N/NA

RMK#

9. Is the notification/certification identified in Question #8 submitted with each shipment of waste? [O.A.C. 3745-59-07 (A) (2); 40 CFR 268.7(a) (2)]

N/A

10. For wastes subject to a case-by-case extension, exemption or a variance: Does the generator provide written notice to the facility receiving the waste that the waste is not prohibited from land disposal? [O.A.C. Rule 3745-59-07 (A) (3); 40 CFR 268.7(a) (3)]

N

If so, does the notice contain the following information:

- (a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07 (A) (3) (a); 40 CFR 268.7(a) (3) (i)]
- (b) The corresponding treatment standard and applicable prohibitions? [O.A.C. Rule 3745-59-07 (A) (3) (b); 40 CFR 268.7(a) (3) (ii)]
- (c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07 (A) (3) (c); 40 CFR 268.7(a) (3) (iii)]
- (d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07 (A) (3) (d); 40 CFR 268.6(a) (3) (iv)]
- (e) The date the waste is subject to the prohibitions? [O.A.C. Rule 3745-59-07 (A) (3) (e); 40 CFR 268.7(a) (3) (v)]

N/A

11. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least five years? [O.A.C. Rule 3745-59-07 (A) (6); 40 CFR 268.7(a) (7)]

Y

REMARKS

LDR - TREATMENT FACILITY REQUIREMENTS

N/A
Facility in
closure

REQUIRED TREATMENT

Y/N/NA RMK#

1. Does the facility treat any restricted wastes for which a specified technology (or technologies) has/have been established as the LDR treatment standard?

(a) If so, is the facility using the appropriate technology as required by O.A.C. Rule 3745-59-42 (40 CFR 268.42)?

(b) If not, has US EPA granted the facility approval to use an alternative treatment method other than the required technology? [O.A.C. Rule 3745-59-42(B); 40 CFR 268.42(b)]

2. Does the facility treat restricted wastes for which a concentration level has been established as the LDR treatment standard?

If so, does the treatment facility test its waste treatment residues according to the following requirements:

- (a) For wastes with treatment standards expressed as a concentration in the waste extract (a CCWE standard found in O.A.C. Rule 3745-59-41; 40 CFR 268.41):

Following treatment, does the treatment facility test the treatment residues or an extract of such residues using the TCLP test to assure that the residues or extract meet the applicable treatment standard? [O.A.C. Rule 3745-59-07(B) (1); 40 CFR 268.7(b) (1)]

- (b) For wastes with treatment standards expressed as concentrations in the waste (a CCW standard found in Rule 3745-59-43; 40 CFR 268.43):

Does the treatment facility test treatment residues (not an extract of such residues) using a total constituent analysis to assure that the residues meet applicable treatment standards? [O.A.C. Rule 3745-59-07(B) (3); 40 CFR 268.7(b) (3)]

3. Does the treatment facility combine waste streams together for the purposes of treatment which have a concentration based LDR treatment standard for the same constituent(s)?

- (a) If so, does the treatment facility ensure that the more stringent standard for the mixture is met? [O.A.C. Rule 3745-59-41(B) and 3745-59-43(B); 40 CFR 268.41(b) and 268.43(b)]

OFF-SITE SHIPMENTS - NOTIFICATION/CERTIFICATION REQS.

Y/N/NA

RMK#

4. For all restricted wastes: Does the treatment facility have hazardous waste and/or treatment residues shipped off-site for land disposal?

If so, does the treatment facility provide the land disposal facility with a written notice containing the following:

- (a) EPA hazardous waste number? [3745-59-07(B) (4) (a); 40 CFR 268.7(b) (4) (i)]
- (b) The corresponding treatment standards and applicable prohibitions for each waste? [3745-59-07(B) (4) (b); 40 CFR 268.7(b) (4) (ii)]
- (c) The manifest number associated with the shipment of waste? [3745-59-07(B) (4) (c); 40 CFR 268.7(b) (4) (iii)]
- (d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(B) (4) (d); 40 CFR 268.7(b) (4) (iv)]

5. Does the facility have any wastes and/or treatment residues shipped off-site for disposal which have been generated from treatment of a restricted waste to meet treatment standards? If so,

For wastes and/or treatment residues generated from the treatment of a waste which has a concentration based treatment standard:

- (a) Does the treatment facility also submit a written certification with each shipment of waste or treatment residue stating that the waste has been treated in compliance with applicable treatment standards? [O.A.C. Rule 3745-59-07(B) (5); 40 CFR 268.7(b) (5)]
- (b) Does the certification contain the language as required by O.A.C. Rule 3745-59-07(B) (5) (a) (40 CFR 268.7(b) (5) (i))?

For wastes and/or treatment residues generated from the treatment of a waste which has a technology based treatment standard:

- (c) With each shipment of treatment residue shipped off-site for disposal, does the treatment facility submit a certification stating that the waste has been treated in accordance with the appropriate treatment technology as specified in O.A.C. Rule 3745-59-42 (40 CFR 268.42)? [O.A.C. Rule 3745-59-07(B) (5); 40 CFR 268.7(b) (5)]

- (d) Is the certification signed by an authorized representative and does it contain the language as specified in O.A.C. Rule 3745-59-07(B) (5) (b) (40 CFR 268.7(b) (5) (ii)?

5. Does the treatment facility have wastes shipped off-site that do not meet treatment standards and/or wastes that must be further managed at a different treatment or storage facility? If so,

- (a) Is the facility complying with the generator notification requirements? [O.A.C. Rule 3745-59-07(B) (6); 40 CFR 268.7(b) (6)]

TREATMENT OF CHARACTERISTIC HAZARDOUS WASTE

7. Does the facility treat characteristic hazardous waste(s) to render such waste(s) non-hazardous?

- (a) If so, are treated waste(s) sent to a licensed solid waste disposal facility?

- i. If so, with each shipment of waste, does the generator submit a notification/certification to the Regional Administrator/Director which contains the following:

- a. Name and address of the facility receiving the waste? [O.A.C. Rule 3745-59-09(D) (1) (a); 40 CFR 268.9(d) (1) (i)]
- b. A description of the waste as initially generated, including EPA hazardous waste numbers and treatability group? [O.A.C. Rule 3745-59-09(D) (1) (b); 40 CFR 268.9(d) (1) (ii)]
- c. The treatment standards applicable to the waste at the initial point of generation? [O.A.C. Rule 3745-59-09(D) (1) (c); 40 CFR 268.9(d) (1) (iii)]

- ii. Is the certification signed by an authorized representative and does it contain the language in O.A.C. Rule 3745-59-07(B) (5) (a) (40 CFR 268.7(b) (5) (i)? [O.A.C. Rule 3745-59-09(D) (2); 40 CFR 268.9(d) (2)]

NOTE: Please see the waste analysis/waste analysis plan portion of the CEI checklist for additional questions regarding LDR requirements.

LDR - LAND DISPOSAL FACILITY REQUIREMENTS

Y/N/NA RMK#

1. Does the land disposal facility retain copies of LDR notices and certifications? [O.A.C. Rule 3745-59-07(C) (1); 40 CFR 268.7(c) (1)]

2. Does the land disposal facility test the waste or an extract of the waste or treatment residue received in accordance with the facility's waste analysis plan to ensure compliance with applicable LDR treatment standards, including: [O.A.C. Rule 3745-59-07(C) (2); 40 CFR 268.7(c) (2)]
 - (a) Conducting the TCLP to test waste/residues which have a CCWE concentration based treatment standard? [O.A.C. Rule 3745-59-07(C) (2); 40 CFR 268.7(c) (2)]

 - (b) Conducting a total constituent analysis to test waste/residues which have a CCW concentration based treatment standard? [O.A.C. Rule 3745-59-07(C) (2); 40 CFR 268.7(c) (2)]

 - (c) Is testing specified in 2(a) and 2(b) conducted in accordance with the frequency set forth in the facility's waste analysis plan? [O.A.C. Rule 3745-59-07(C) (2); 40 CFR 268.7(c) (2)]

NOTE: Analytical testing of residues which have been generated from treatment of a waste which has a technology based treatment standard only is not required.

3. Where applicable, does the land disposal facility ensure that only restricted wastes/residues which meet applicable concentration based treatment standards of O.A.C. rules 3745-59-41 or 3745-59-43 (268.41 or 268.43) are disposed of? [O.A.C. Rule 3745-59-40(A), (C); 40 CFR 268.40(a), (c)]

4. Where applicable, does the land disposal facility ensure that only restricted wastes/residues which have been treated using the specified technology of O.A.C. Rule 3745-59-42 (40 CFR 268.42) are disposed of? [O.A.C. Rule 3745-59-40(B); 40 CFR 268.40(b)]

NOTE: Please see the waste analysis/waste analysis plan portion of the CEI checklist for additional questions regarding LDR requirements.

TREATMENT OF LDR WASTES IN SURFACE IMPOUNDMENTS

| | Y/N/NA | RMK# |
|--|--------|-------|
| 1. Does the owner/operator treat wastes which are prohibited from land disposal in a surface impoundment or series of impoundments? If so, are the following conditions met: | _____ | _____ |
| (a) The residues from treatment are analyzed to determine if they meet applicable treatment standards? [O.A.C. Rule 3745-59-04 (A) (2) (a); 40 CFR 268.4 (a) (2) (i)] | _____ | _____ |
| (b) The sampling method is designed so that representative samples of the sludge and the supernatant are tested separately rather than mixed to form homogeneous samples? [O.A.C. Rule 3745-59-04 (A) (2) (a); 40 CFR 268.4 (a) (2) (i)] | _____ | _____ |
| (c) Treatment residues (including any liquid waste) which do not meet treatment standards or prohibition levels are removed from the impoundment at least annually? [O.A.C. Rule 3745-59-04 (A) (2) (b); 40 CFR 268.4 (a) (2) (ii)] | _____ | _____ |
| i. Such residues are not placed in any other surface impoundment? [O.A.C. Rule 3745-59-04 (A) (2) (c); 40 CFR 268.7 (a) (2) (iii)] | _____ | _____ |
| (d) Procedures and schedules for sampling the impoundment contents, analysis of test data and removal of residues which do not meet treatment standards have been established? [O.A.C. Rule 3745-59-04 (A) (2) (d); 40 CFR 268.4 (a) (2) (iv)] | _____ | _____ |
| i. Such procedures and schedules are specified in the facility's waste analysis plan as required by O.A.C. Rule 3745-65-13 (265.13)? [O.A.C. Rule 3745-59-04 (A) (2) (d); 40 CFR 268.4 (a) (2) (iv)] | _____ | _____ |
| ii. A copy of the waste analysis plan has been submitted to the Director? [O.A.C. Rule 3745-59-04 (A) (4); 40 CFR 268.4 (a) (4)] | _____ | _____ |
| (e) The impoundment meets the design requirements of O.A.C. Rule 3745-56-21 (C) (40 CFR 264.221 (c)) or 3745-67-21 (A) (40 CFR 265.221 (a))? [O.A.C. Rule 3745-59-04 (A) (3); 40 CFR 268.4 (a) (3)] | _____ | _____ |
| (f) The impoundment meets groundwater monitoring requirements (unless exempt from such requirements)? [O.A.C. Rule 3745-59-04 (A) (3); 40 CFR 268.4 (a) (3)] | _____ | _____ |

Y/N/NA

RMK#

- (g) The owner/operator has submitted a written certification to the Director which states that the surface impoundment meets the above requirements referenced in Questions 1(a), through (f)? [O.A.C. Rule 3745-59-04(A) (4); 40 CFR 268.4(a) (4)]

NOTE: Please see the waste analysis/waste analysis plan portion of the CEI checklist for additional questions regarding LDR requirements.

REMARKS

STORAGE OF LAND DISPOSAL RESTRICTED WASTES

NOTE: The following questions apply to operators of treatment, storage or disposal (TSD) facilities that accumulate Land Disposal Restricted wastes that do not meet treatment standards in tanks or containers. A large quantity generator who stores LDR wastes on-site for greater than 90 days becomes an operator of a storage facility and must comply with all applicable TSD requirements. SQGs become owners/operators of storage facilities if storage of LDR wastes exceeds 6,000 kg. or 180/270 days.

NOTE: The LDR storage prohibition does not apply to wastes which are subject to a national capacity variance, variance from the treatment standard or case-by-case extension during the period of extension/variance. The LDR storage prohibition also does not apply to wastes subject to a no-migration petition or to wastes which meet treatment standards. [O.A.C. Rule 3745-59-50(E); 40 CFR 268.50(e)]

| | Y/N/NA | RMK# |
|---|--------|------|
| 1. Is the owner/operator storing land disposal restricted wastes in containers? If so, is each container marked with the following information in accordance with O.A.C. Rule 3745-59-50(A)(2)(a) (40 CFR 268.50(a)(2)(i)): | | |
| (a) The identification of the contents? | | |
| (b) The date which accumulation began? | | |
| 2. Is the owner/operator storing land disposal restricted wastes in tanks? If so, is each tank marked with the following information in accordance with O.A.C. Rule 3745-59-50(A)(2)(b) (40 CFR 268.50(a)(2)(ii)): | | |
| (a) A description of its contents? | | |
| (b) The quantity of each hazardous waste received? | | |
| (c) The date each period of accumulation begins? or; | | |
| (d) Is the information required by 2(a), 2(b) and 2(c) being recorded and maintained in the facility's operating record? [O.A.C. Rule 3745-59-50(A)(2)(b); 40 CFR 268.50(a)(2)(ii)] | | |
| 3. Are land disposal restricted wastes being stored at the facility for greater than one year? If so, | | |
| (a) Has the owner/operator demonstrated that such storage is being conducted solely for the purpose of accumulating sufficient quantities of wastes necessary to facilitate proper recovery, treatment or disposal? [O.A.C. Rule 3745-59-50(A)(1); 40 CFR 268.50(a)(1)] | | |

NOTE: A TSD facility may store Land Disposal Restricted wastes on-site for the purpose of accumulating a sufficient amount of waste for proper recovery, treatment or disposal. [O.A.C. Rule 3745-59-50(B)] During the first of storage, the burden of proof is on Ohio EPA to demonstrate that such storage is not necessary by the facility. Following one year, the burden of proof shifts to the storage facility to demonstrate that such storage of LDR wastes is necessary to facilitate proper recovery, treatment or disposal.

The requirements of O.A.C. Rule 3745-59-50(C) (40 CFR 268.50(c)) found in Question #3 do not apply to those facilities that store hazardous wastes containing PCBs at concentrations greater than or equal to 50 ppm. Please go to Question #4 for applicable requirements.

Y/N/NA RMK#

4. Does the owner/operator store liquid hazardous wastes which also contain PCBs at concentrations greater than or equal to 50 ppm for greater than 90 days (180/270 days if SQG)?
If so, _____

(a) Does the facility remove from storage and treat or dispose of such PCB hazardous wastes within one year from the date that the wastes were initially placed in storage? [O.A.C. Rule 3745-59-50(F); 40 CFR 268.50(f)] _____

NOTE: In addition to complying with the requirement found in Question 4(a), the facility must also meet the requirements of 40 CFR 761.65(b). [O.A.C. Rule 3745-59-50(F); 40 CFR 268.50(f)]

REMARKS

**RCRA HAZARDOUS WASTE GENERATOR
COMPLIANCE EVALUATION INSPECTION CHECKLIST**

Facility: EKCO HOUSEWARES, INC
USEPA I.D.: OHD 045 205 424
Street: 359 STATE AVE., N.W.
City: MASSILLON State: OH zip: 44648
County: STARK Telephone: (216) 832-5026

Owner/Operator: _____
Street: _____
City: _____ State: _____ Zip: _____
Telephone: _____ Fax: _____

Inspection Date: 01/06/93 Time: 9:15 - 11:30

Advance notice of inspection given? (yes) _____ (no) ✓
If so, how far in advance? _____

| | <u>Name</u> | <u>Agency/Title</u> | <u>Phone</u> |
|--------------------------|------------------------|---|-----------------------|
| Inspectors: | <u>KAREN NESBIT</u> | <u>OEPA / E. SPEC 2</u> | <u>(216) 963-1200</u> |
| | <u>Nancy Zikmanis</u> | <u>↓</u> | <u>↓</u> |
| Facility Representative: | <u>JEFF RICHARDSON</u> | <u>ENVIR + QUALITY CONTROL ENGINEER</u> | <u>(216) 832-5026</u> |

STATUS

Cond. Exempt SQG _____ SQG _____ Large Quantity Generator ✓
LDR Checklist Attached: (yes) ✓ (no) _____

NOTE: LDR requirements are not applicable to CESQGs.

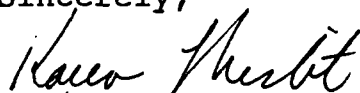
ACTIVITIES

| | |
|------------------------------|---|
| Containers <u>✓</u> | Used oil burner _____ |
| Tanks _____ | Hazardous waste fuel burner/blender _____ |
| Wastepile _____ | Incineration/Thermal treatment _____ |
| Landfill _____ | Land treatment _____ |
| Surface Impoundment <u>✓</u> | Groundwater monitoring <u>✓</u> |

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Mr. Thomas Shingleton
January 13, 1993

If you should have any questions or problems, please feel free to contact either Mr. Harry Courtright or me at (216) 963-1200.

Sincerely,



Karen L. Nesbit
Environmental Scientist
Division of Hazardous Waste Management

KLN.wk

cc: Harry Courtright, DHWM, NEDO
Laurie Stevenson, DHWM, CO



State of Ohio Environmental Protection Agency

Northeast District Office

110 E. Aurora Road
Mansfield, Ohio 44887-1969
(216) 425-9171
FAX (216) 487-0769

TRACKING - DHWM, CM&S
TO GO ON: ☒ RCRIS ☐ FO LOG ☐ USEPA LOG ☐ CJ LOG ☐ FILE
ENTERED: ☒ RCRIS ☐ FO LOG ☐ USEPA LOG ☐ CJ LOG ☐ ONLY
RCRIS ENTRY CODES: (EVALUATION) 018 (ENFORCEMENT) 018
CEI ☒ CI ☐ OTHER ☐ INITIAL NOV ☐ FOLLOW-UP NOV ☐
FULL RTC ☐ PARTIAL RTC ☐ LDR ☒ SENT TO USEPA: YES ☐ NO ☐

SM

George V. Voinovich
Governor

January 13, 1993

RE: EKCO HOUSEWARES, INC.
STARK COUNTY
OHD 045 205 424
NOTICE OF VIOLATION

Mr. Thomas Shingleton
Ekco Housewares, Inc.
359 State Avenue, NW
P.O. Box 560
Massillon, OH 44658

CERTIFIED MAIL

RECEIVED
OFFICE

JAN 14 1993

Dear Mr. Shingleton:

On January 6, 1993, Nancy Zikmanis and I representing the Ohio EPA's Division of Hazardous Waste Management conducted a hazardous waste compliance evaluation inspection at your facility. Jeff Richardson represented Ekco during the inspection. During the inspection the following violations were noted:

- 1) The facility failed to provide an annual refresher training course as required by OAC 3745-65-16(B) [3745-52-34(A)(4)].

Ekco shall conduct the annual refresher training and submit documentation showing that all the necessary personnel has been trained.

- 2) The facility has failed to test all required spill control and decontamination equipment, fire and communication equipment on a weekly basis and maintain the equipment as necessary, as required by OAC 3745-65-33. This test must be documented on an inspection log as required by OAC 3745-65-33(B). The log shall include the following information:

- a) date and time of the inspection;
- b) name of the person conducting the inspection;
- c) observations made; and
- d) date and nature of any repairs.

The facility shall start conducting these tests and submit documentation showing that these inspections have been conducted for the next two weeks.

- 3) The facility has failed to include the corresponding treatability standards in the Land Disposal Restriction (LDR) notice for each waste restricted from land disposal on the Ross Incinerator LDR forms #79, 69, 68, 62 and 53 as required by OAC 3745-59-07(A)(1)(b).

Page - 2 -
Mr. Thomas Shingleton
January 13, 1993

The facility shall inform all personnel who may sign the LDR forms that the corresponding treatment standards and applicable prohibitions must be indicated on the notice. The facility shall submit a copy of the next LDR form which has been correctly filled out to demonstrate that the violation has been corrected.

- 4) The facility has failed to retain on-site a copy of all LDR forms for at least five years as required by OAC 3745-59-07(A)(6). The facility failed to retain a copy of the LDR form for manifest #00050 to Chemtron.

The facility shall obtain a copy of the form from Chemtron and submit a copy to demonstrate that the violation has been corrected.

- 5) The facility did not use the correct EPA hazardous waste numbers on the LDR forms which accompanied manifests #00072 and 00075. The LDR form used waste codes F002/F003/F005/D001 when the correct codes were F001/D040 in violation of OAC 3745-59-07(A)(1)(a).

The facility shall notify the TSD facility to which these loads were shipped, correcting this error and submit a copy of this notification to this office to document that the violation has been corrected.

Concerns:

- 1) The facility is advised to find an alternate method of labeling the satellite accumulations buckets at the paint booths. The facility may try labeling the lids of the buckets or tagging the buckets.
- 2) The facility should submit a copy of the new contingency plan when it becomes available.

Please be advised that any instances of non-compliance can continue as subjects of pending or future enforcement actions.

This inspection did not include a review of compliance with closure, ground water or financial assurance requirements.

Please submit the requested documentation by February 12, 1993. I have enclosed a copy of my check sheets for your use.

REMARKS - GENERAL INFORMATION

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling procedures:

ERCO generates silicon coated bakeware

They generate:

FOO1 - still bottom wastes
D001, F003, F005 - Paint booth sludges
D001 - chlorinated scrap batch mixes
F003, F005 - Paint booth water
F003, F005, D001 - Paint booth floor
D001, F005 - silicon paint waste
D001, D018, D039 - S-K parts washer
F001, D040 - degreaser

The wastes are shipped off site to permitted TSD's. (see next page)

The facility has a surface impoundment which American Home Products is pursuing closure for. The closure is in adjudication.

OFF SITE MANAGEMENT

[illegible]

GENERATOR CLASSIFICATION (OAC 3745-52-34)

Does the facility:

1. Generate < 100 Kg (25-30 gallons) of hazardous waste in a calendar month?

(yes) _____ (no) ✓

If so, the facility is classified as a Conditionally Exempt Small Quantity Generator, unless 3.b. applies. Please complete the Conditionally Exempt Small Quantity Generator Requirements checklist.

2. Generate between 100 and 1000 Kg of hazardous waste in a calendar month? (about 25 to under 300 gallons)

(yes) _____ (no) ✓

If so, the facility is classified as a Small Quantity Generator, unless 3.b. applies. Please stop here and complete the Small Quantity Generator Requirements checklist.

3. a. Generate > 1000 Kg (~ 300 gallons) of hazardous waste in a calendar month?

(yes) ✓ (no) _____

or;

- b. Generate > 1 Kg of acutely hazardous waste in a calendar month?

(yes) _____ (no) ✓

If so, the facility is classified as a Large Quantity Generator. Please complete the Large Quantity Generator Requirements checklist.

REMARKS - GENERATOR CLASSIFICATION

OAC 3745-52 - LARGE QUANTITY GENERATOR REQUIREMENTS

WASTE EVALUATION (OAC 3745-52-11)

Y/N/NA RMK #

1. Have wastes generated at the facility been evaluated in compliance with the waste evaluation requirements of OAC rule 3745-52-11(A) (B) and (C)?

Y _____

- (a) Has the generator's evaluation identified in Question #1 included an evaluation for the (TC) Toxicity Characteristics identified in 3745-51-24? [3745-52-11(C)].

Y _____

NOTE: The TC rule requirement noted above must include an evaluation of the metal as well as organic TC constituents identified in 3745-51-24.

If not, specify those waste streams which the generator has failed to adequately evaluate:

2. Are any wastes generated at the facility identified by the generator as being excluded from regulation under Rule 3745-51-04?

N _____

If so, specify those waste streams identified by the generator as being excluded under 3745-51-04:

3. Is the facility generating any wastes which are identified as recyclable materials as defined in OAC 3745-51-06(A)?

Y _____

If so, please identify these waste streams below:

4. In accordance with OAC rule 3745-51-02(E), is the generator recycling any materials on-site by:
- a. Using or reusing the material as an ingredient in an industrial process to make a product?
 - i. If so, is the material being reclaimed before it is used or reused?
 - b. Using the material as a substitute for commercial products?
 - c. Returning the material to the original process from which it was generated as a substitute for a raw material feedstock?
 - i. If so, is the material reclaimed before returning to the original process?

Y
Y
Y
Y
Y

NOTE: The materials identified in Question #4 may not be considered wastes if recycled as described above, unless the conditions identified in Questions 4(a)(i) or 4(c)(i) are true. See O.A.C. Rule 3745-51-02(E).

Please identify those materials that the generator is recycling as described in 4.a., 4.b. and/or 4.c. below:

Paint Booth sludges being reclaimed

5. Has the generator identified any waste treatment activity as being excluded from regulation because of totally enclosed treatment or via operation of an elementary neutralization unit and/or wastewater treatment unit as described in Rule 3745-65-01?

N

If so, specify those waste treatment activities which the generator has identified as being excluded from regulation:

GENERATOR IDENTIFICATION NUMBER (OAC 3745-52-12)

6. Prior to treating, storing, disposing, transporting or offering to transport hazardous waste, has the generator obtained a generator identification number from US EPA or Ohio EPA as required by 3745-52-12?

Y

GENERATOR ANNUAL REPORT (OAC 3745-52-41)

7. Has the generator filed annual reports to the Director on or before March 1st of each calendar year as required by 3745-52-41?

Y

**HAZARDOUS WASTE IMPORT/EXPORT (OAC 3745-52-50 TO 3745-52-57
AND OAC 3745-52-60)**

Y/N/NA RMK #

8. Does the generator import or export hazardous waste?

N

If so, are the wastes handled in accordance with the
requirements of 3745-52-50 through 3745-52-57 and
3745-52-60?

NA

REMARKS - HAZARDOUS WASTE IMPORT/EXPORT

PRE-TRANSPORT REQUIREMENTS (OAC 3745-52-30 TO 3745-52-33)

9. Does the generator meet the following pre-transport
requirements prior to offering hazardous wastes for
transport off-site:

- a. The waste material is packaged, labeled, and marked
in accordance with the applicable DOT regulations
[3745-52-30, 3745-52-31, and 3745-52-32(A)]?
- b. Each container with a capacity of 110 gallons or less
is affixed with a completed hazardous waste label as
required by 3745-52-32(B)?
- c. Before transporting hazardous wastes off-site or
offering hazardous wastes for transportation off-
site, does the generator placard or offer the
appropriate DOT placards to the initial transporter
in compliance with 3745-52-33?

Y

Y

Y

REMARKS - PRETRANSPORT REQUIREMENTS

GENERATOR CLOSURE REQUIREMENTS (3745-52-34)

Y/N/NA RMK #

1. Has the generator closed any < 90-day accumulation unit(s) since date of last inspection?

N _____

If so, describe the unit(s) which the generator has closed:

2. If the generator has closed any < 90-day accumulation unit(s) as described in Question #1, was closure completed to meet the closure performance standard of 3745-66-11? [3745-52-34 (A) (1)]

NA _____

Please provide a description of the type of documentation provided by the generator to confirm that closure was completed in accordance with the closure performance standard:

3. If the < 90 day unit closed was a tank system, did the generator also complete closure in accordance with the tank system closure requirements of 3745-66-97 (A) and (B)? [3745-52-34 (A) (1)]

NK _____

REMARKS - GENERATOR CLOSURE REQUIREMENTS

PERSONNEL TRAINING (OAC 3745-65-16)

Y/N/NA RMK #

HL Does the generator provide a personnel training program in compliance with 3745-65-16(A) (B) (C) including instruction in safe equipment operation and emergency procedures, and implementation of the contingency plan? [3745-52-34(A) (4)]

Y NA

2. Does the generator provide personnel training to new employees within 6 months after the date of employment as required by 3745-65-16(B)? [3745-52-34(A) (4)]

Y

3. Does the generator provide an annual refresher training course as required by 3745-65-16(B)? [3745-52-34(A) (4)]

N

4. Does the generator keep all the records required by 3745-65-16(D) (E) including; written job titles, job descriptions and documented employee training records? [3745-52-34(A) (4)]

Y

REMARKS - PERSONNEL TRAINING REQUIREMENTS

CONTINGENCY PLAN (OAC 3745-65-50 THROUGH 3745-65-56)

Y/N/NA RMK #

1. Does the o/o have a written contingency plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes which contains the following components: [3745-65-52 (A) (B) (C) (D) (E)]
 - a. Actions to be taken by personnel in the event of an emergency? Y
 - b. Arrangements or agreements with local or state emergency authorities? Y
 - c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator? Y
 - d. A list of all emergency equipment including location, physical description and outline of capabilities? Y
 - e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52 (F)]? Y
2. Is the contingency plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste or hazardous waste constituents to air, soil or surface water? [3745-65-51 (A)] Y
3. Is a copy of the contingency plan and any plan revisions maintained on-site and has the plan been submitted to all local and state emergency authorities that might be required to participate in execution of the plan? [3745-65-53 (A) (B)] Y
4. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] Y
5. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the contingency plan designated at all times (on-site or on-call)? [3745-65-55] Y
6. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the contingency plan and taken all of the actions and made all of the notifications necessary under 3745-65-56 (A-J)? N

#1
The plan is
being revised
and a new
plan is to
be submitted
to OHSDEP

PREPAREDNESS AND PREVENTION (OAC 3745-65-30 TO 3745-65-37)

Y/N/NA RMK #

1. Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31]

Y _____

2. Has there been a fire, explosion or non-planned release of waste at the facility since date of last inspection?

N _____

a. If yes, was the contingency plan implemented? [3745-65-51(B)]

NA _____

NOTE: Small quantity generators are not required to maintain a contingency plan. Question #2(a) is, therefore, not applicable to SQGs.

3. If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A) (B) (C) (D)]

a. Internal alarm system?

Y _____

b. Access to telephone, radio or other device for summoning emergency assistance?

Y _____

c. Portable fire control equipment, spill control and decontamination equipment?

Y _____

d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?

Y _____

④ 4. Is all required spill control and decontamination equipment, fire and communications equipment tested on a weekly basis and maintained as necessary? [3745-65-33]

N _____

a. Does the facility keep an equipment testing log required by 3745-65-33(B), including date and time of test, name of person conducting the test, observations made, and date and nature of any repairs?

N _____

5. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34]

Y _____

6. If required due to the actual hazards associated with the waste, is adequate aisle space maintained to allow unobstructed movement of emergency or spill control equipment? [3745-65-35]

Y _____

Y/N/NA RMK #

7. If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with possible hazards and facility layout? [3745-65-37(A)]
8. Where state and local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented? [3745-65-37(B)]

Y

NA

REMARKS - CONTINGENCY PLAN/PREPAREDNESS AND PREVENTION REQUIREMENTS

GENERATOR ACCUMULATION IN CONTAINERS AND TANKS
(OAC 3745-52-34)

Y/N/NA RMK #

1. If the generator elects to accumulate hazardous waste on-site in containers or tanks for 90 days or less without a permit as provided under 3745-52-34, are the following requirements met:

a. The containers or tanks are clearly marked with the words "Hazardous Waste?" [3745-52-34 (A) (3)]

Y _____

b. The date that accumulation began is clearly marked on each container? [3745-52-34 (A) (2)]

Y _____

In addition, OAC 3745-52-34 (A) (1) also requires generators accumulating hazardous waste(s) in containers < 90 days to comply with the "Container Management" Rules of OAC 3745-66-70 to 3745-66-77. If the generator is accumulating hazardous waste(s) in containers, please complete Management of Containers checklist to document compliance with these requirements.

2. Is the generator accumulating hazardous waste(s) in tanks? N _____

If so, OAC 3745-52-34 (A) (1) requires generators to comply with rules 3745-66-90 to 3745-66-992 except paragraph (C) of rule 3745-66-97 and rule 3745-66-991.

If the generator is accumulating hazardous waste(s) in tanks, complete the Tank System Requirements checklist to document compliance with these requirements.

3. Has the generator accumulated hazardous wastes in excess of ninety (90) days? N _____

a. If so, has the generator been granted an extension by the Director for accumulation in excess of (90) days? NA _____

REMARKS - GENERATOR ACCUMULATION REQUIREMENTS

USE AND MANAGEMENT OF CONTAINERS (OAC 3745-66-70 TO 3745-66-77)

Y/N/NA RMK #

1. Are hazardous wastes stored in containers which are:
 - a. Closed? [3745-66-73(A)] Y ~~NA~~
 - b. In good condition? [3745-66-71] Y
 - c. Compatible with wastes stored in them? [3745-66-72] Y
2. Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)] Y
3. Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)] Y
4. Is the area where containers are stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74] Y
5. Is the facility recording inspections described in Question #4 in an inspection log or inspection summary as required by OAC 3745-66-74(B) which contains the following information:
 - a. Date and time of inspections? Y
 - b. Name of inspector? Y
 - c. Notation of observations made during the inspection? Y
 - d. The date and nature of any repairs or other remedial action? Y
6. Are ignitable and/or reactive hazardous waste(s) being managed at the facility? If so, Y
 - a. Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Y
 - b. Are containers holding hazardous wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] Y

NOTE: Small Quantity Generators are not required to comply with OAC Rule 3745-66-67 (except for wastes being accumulated in satellite accumulation areas). [See OAC Rules 3745-52-34(D) (2) and (C) (1) (a)]

SATELLITE ACCUMULATION AREA REQUIREMENTS
(OAC 3745-52-34 (C))

Y/N/NA RMK #

1. Has the facility elected to accumulate hazardous waste at or near a point of generation which is under the control of the operator of the process generating the waste? (defined as satellite accumulation)

Y _____

If so, are the following requirements of OAC 3745-52-34 (C) being met:

- a. Quantities of waste accumulated do not exceed 55 gallons at any time?
- b. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time?
- c. The generator has marked the containers with words "Hazardous Waste" or with other words identifying the contents of the container?

Y _____

NA _____

Y #1 _____

If the facility is maintaining satellite accumulation areas as identified in 1.a. and 1.b. above, OAC 3745-52-34 (C) also requires that the container(s) in these areas be managed in compliance with the "Container Management" requirements of OAC 3745-66-71, 3745-66-72, 3745-66-73 (A), 3745-66-76 and 3745-66-77. Please complete the Use and Management of Containers checklist to document compliance with these requirements.

2. Is the facility accumulating hazardous waste(s) in excess of the amounts listed in either 1.a or 1.b?

N _____

- a. If so, did the generator comply with 3745-52-34 (A) within three (3) days? and;

NA _____

- b. Upon accumulating > 55-gallons of waste, did the generator mark the container holding the excess hazardous waste with the date the excess began accumulating?

NA _____

REMARKS - SATELLITE ACCUMULATION REQUIREMENTS

#1 concern - the satellite drums need to be labelled

OAC 3745-67 SURFACE IMPOUNDMENTS

Y/N/NA RMK #

1. Is at least 2 feet (60 cm) of freeboard maintained in the surface impoundment, or has written certification that the impoundment is of adequate design been prepared? [3745-67-22] Y _____
2. Are earthen structural containment systems equipped with protective cover such as grass, shale or rock to minimize erosion from wind and water? [3745-67-23] Y _____
3. Is the level of freeboard in the surface impoundment inspected at least once each operating day? [3745-67-26 (A)] NA _____
4. Is the structural containment system inspected at least once per week? [3745-67-26 (B)] Y _____
5. Are the inspections noted in Question 4 and 5 documented? [3745-65-15 (B) (4)] Y _____

MANAGEMENT OF IGNITABLE/REACTIVE WASTE IN SURFACE IMPOUNDMENTS

6. Whenever a surface impoundment is used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the surface impoundment, has the facility insured the safety of such changes by: [3745-67-25]
 - a. Waste analyses and trial treatment? or; NA _____
 - b. Written documented information on similar treatment of similar waste under similar conditions? _____
7. With the exception of emergency situations, whenever ignitable or reactive wastes are placed in a surface impoundment, has the facility insured the safety of the operation by complying with the following: [3745-67-29 and 3745-65-17]
 - a. The waste is immediately treated after placement in the surface impoundment so that it is no longer hazardous? _____
 - b. The waste is managed to protect from ignition? _____
 - c. A certification from a qualified chemist or engineer is maintained at the facility stating that the design/operation of the unit will prevent ignition or reaction? ✓ _____

8. Is the placement of incompatible waste materials in the same surface impoundment done in compliance with the safety requirements of 3745-65-17? [3745-67-30] NA
9. At closure, were all standing liquids, waste residues, liners, and contaminated soil removed from the unit? [3745-67-28] |
10. Has the owner/operator retrofitted the surface impoundment or ceased receipt of hazardous waste by November 8, 1988? |
- If no, did USEPA grant an exemption prior to that date? |

NOTE: If the operator elects not to exempt the surface impoundment from further regulation by removing all waste materials, the surface impoundment is subject to the post-closure care and ground water monitoring requirements specified in 3745-68-10 and 3745-67-28(C).

REMARKS - SURFACE IMPOUNDMENT REQUIREMENTS

MANIFEST REQUIREMENTS (OAC 3745-52-20 TO 3745-52-23)

Y/N/NA RMK #

1. Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:
 - a. All hazardous wastes shipped off-site have been accompanied by a completed manifest, US EPA form 8700-22 in compliance with 3745-52-20(A)? Y
 - b. The manifest contains all information required by 3745-52-20 and the minimum number of copies required by 3745-52-22? Y
 - c. The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20(C) (D) (E)? Y
 - d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23 (A) (1) (2)? Y
2. Has the generator received a return copy of each completed manifest within thirty-five (35) days of the date the waste was accepted by the initial transporter? Y
 - a. If not, has the generator complied with the manifest exception reporting requirements in 3745-52-42? N/A

NOTE: The manifest exception reporting requirement identified in Question #2 above is applicable to large quantity generators only. See Question #3 for manifest exception reporting requirements for small quantity generators.

3. If the generator is acting as a small quantity generator, (> 100 kg but < 1000 kg of hazardous waste in a calendar month) has the generator received a return copy of each completed manifest within sixty days of receipt by the initial transporter? [3745-52-42(B)] N/A
 - a. If not, did the generator submit a legible copy of the manifest with some indication that the generator has not received confirmation of delivery to the Ohio EPA? [3745-52-42(B)] N/A
4. Are signed copies of all hazardous waste manifests and any documentation required for Exception Reports retained for at least 3 years as required by 3745-52-40? Y

*Manifest 00075 - F002, F003, F005, 0001 put LDR - F001/D040
00074, 69, 68, 62, 53 (R025) - Treatment not checked*

*00050 - no LDR
00072 - LDR for F002 not
Final LDR*

MANIFEST -1-

(5/29/92)
FINAL

OAC CHAPTER 3745-59 - LDR GENERAL REQUIREMENTS

CASE-BY-CASE EXTENSIONS

Y/N/NA RMK#

1. Has the entity received an extension for compliance with land disposal restrictions from US EPA pursuant to 40 CFR 268.5? If yes,

N

(a) List the waste(s) affected:

- (b) Has the extension been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-05(C)]

N/A

(c) When does the extension expire? _____

NOTE: A case-by-case extension can be granted for up to one year. The extension is renewable once (by US EPA) for an additional year. Until receiving approval of the extension by US EPA and recognition of the extension by the Director of Ohio EPA, the entity must continue to manage the waste in accordance with all applicable LDR requirements.

VARIANCE FROM A TREATMENT STANDARD

2. Has the entity been granted a variance from a treatment standard by US EPA pursuant to 40 CFR 268.44? If yes,

N

(a) List the waste(s) affected:

- (b) Has the variance been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-44(C)]

N/A

NOTE: Until the variance has been approved by US EPA and recognized by the Director of Ohio EPA, the entity must continue to manage the waste in compliance with the LDR requirements.

NO MIGRATION PETITION

Y/N/NA RMK#

3. Has the entity received a variance from US EPA to allow for continued land disposal of untreated LDR wastes based upon a demonstration that there will be no migration from the disposal unit pursuant to 40 CFR 268.6? If yes,

(a) List the waste(s) affected:

(b) Has the entity's "no migration" demonstration been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-06(C)]

NOTE: Until the no migration petition has been approved by US EPA and recognized by the Director of Ohio EPA, the entity must continue to manage the waste in compliance with the LDR requirements.

PROHIBITION AGAINST DILUTION

4. Does the entity dilute a restricted waste or a treatment residue from a restricted waste: [O.A.C. Rule 3745-59-03; 40 CFR 268.3]

(a) As a substitute for adequate treatment to achieve compliance with LDR treatment standards?

(b) To circumvent the effective date of a prohibition (e.g. to dilute a "non-wastewater" waste to a "wastewater" to avoid complying with the "non-wastewater" treatment standard)?

(c) To otherwise avoid a prohibition in O.A.C. Rules 3745-59-30 through 3745-59-35 (40 CFR 268.30 through 268.35)?

(d) To otherwise avoid a prohibition imposed by Section 3004 of RCRA?

NOTE: If the answer to any of the Questions 4(a) through 4(d) above is yes, the entity is impermissibly diluting a restricted waste and is in violation of O.A.C. Rule 3745-59-03 (40 CFR 268.3).

NOTE: Dilution of wastes is permissible under some conditions. See O.A.C. Rule 3745-59-03(B) (40 CFR 268.3) and the Third Third final rule preamble for additional information.

LDR - GENERATOR REQUIREMENTS

NOTE: The following requirements apply only to large quantity generators and small quantity generators. Conditionally exempt small quantity generators are exempt from land disposal restriction requirements as referenced in O.A.C. Rules 3745-59-01(E) (1) (40 CFR 268.1(e) (1)) and 3745-51-05(B) (40 CFR 261.5(b)).

EVALUATION OF WASTES/DETERMINING APPROPRIATE TREATMENT STANDARDS

Y/N/NA RMK#

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]

Y _____

(a) For determinations based solely on knowledge of the waste: Is supporting data used to make this determination being retained on-site? [O.A.C. Rule 3745-59-07(A) (5); 40 CFR 268.7(a) (5)]

Y _____

(b) For determinations based upon analytical testing: Is a copy of waste analysis data being retained on-site? [O.A.C. Rule 3745-59-07(A) (5); 40 CFR 268.7(a) (5)]

Y _____ Done TC testing

2. Has the generator determined the correct "treatability group" for each waste restricted from land disposal (e.g. wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]

N _____ Road Inc #74, 69, 68, 62, 53

3. Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]

Y _____

4. Does the entity generate any listed waste(s) which are restricted from land disposal? If so,

Y _____

(a) Do such wastes also exhibit hazardous waste characteristics as identified in O.A.C. Rules 3745-51-20 to 3745-52-24? (40 CFR 261.20 through 261.24)?

Y _____

(b) For listed wastes which also exhibit a characteristic: Does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [O.A.C. Rule 3745-59-09(A); 40 CFR 268.9(a)]

N _____ All #2

NOTE: The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g. a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See O.A.C. Rule 3745-59-09(B); 40 CFR 268.9(b)]

TREATMENT OF CHARACTERISTIC HAZARDOUS WASTE

Y/N/NA RMK#

5. Does the generator treat characteristic hazardous waste(s) in a RCRA-exempt unit to render such wastes non-hazardous? N
- (a) If so, are treated waste(s) sent to a licensed solid waste disposal facility? N/A
- i. If so, with each shipment of waste, does the generator submit a notification and certification to the Regional Administrator/Director which contains the following:
- a. Name and address of the facility receiving the waste? [O.A.C. Rule 3745-59-09(D) (1) (a); 40 CFR 268.9(d) (1) (i)]
- b. A description of the waste as initially generated, including EPA hazardous waste numbers and treatability group? [O.A.C. Rule 3745-59-09(D) (1) (b); 40 CFR 268.9(d) (1) (ii)]
- c. The treatment standards applicable to the waste at the initial point of generation? [O.A.C. Rule 3745-59-09(D) (1) (c); 40 CFR 268.9(d) (1) (iii)]
- ii. Is the certification signed by an authorized representative and does it contain the language in O.A.C. Rule 3745-59-07(B) (5) (a) (40 CFR 268.7(b) (5) (i)? [O.A.C. Rule 3745-59-09(D) (2); 40 CFR 268.9(d) (2)]

NOTE: An example of a RCRA-exempt unit would include an elementary neutralization unit or a wastewater treatment unit as defined by O.A.C. Rule 3745-50-10. [See O.A.C. Rule 3745-65-01]

REMARKS

NOTIFICATION/CERTIFICATION

Y/N/NA

RMK#

6.

For wastes that do not meet treatment standards: Does the generator notify the treatment/storage facility receiving the wastes, in writing, that wastes being received do not meet treatment standards? [O.A.C. Rule 3745-59-07(A) (1); 40 CFR 268.7(a) (1)]

If so, does the notification include the following:

(a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A) (1) (a); 40 CFR 268.7(a) (1) (i)]

(b) Appropriate treatment standard for the waste? [O.A.C. Rule 3745-59-07(A) (1) (b); 40 CFR 268.7(a) (1) (ii)]

(c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A) (1) (c); 40 CFR 268.7(a) (1) (iii)]

(d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A) (1) (d); 40 CFR 268.7(a) (1) (iv)]

7. Is the notification identified in Question #6 submitted with each shipment of waste? [O.A.C. Rule 3745-59-07(A) (1); 40 CFR 268.7(a) (1)]

8. **For wastes that meet treatment standards:** Does the generator submit a written notice and certification to the treatment, storage or disposal facility receiving the wastes stating wastes being received meet applicable treatment standards? [O.A.C. Rule 3745-59-07(A) (2); 40 CFR 268.7(a) (2)]

If so, does the notice/certification include the following:

(a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A) (2) (a) (i); 40 CFR 268.7(a) (2) (i) (A)]

(b) The corresponding treatment standards and applicable prohibitions for the waste? [O.A.C. Rule 3745-59-07(A) (2) (a) (ii); 40 CFR 268.7(a) (2) (i) (B)]

(c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A) (2) (a) (iii); 40 CFR 268.7(a) (2) (i) (C)]

(d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A) (2) (a) (iv); 40 CFR 268.7(a) (2) (i) (D)]

(e) Is the certification signed by the generator or an authorized representative? [O.A.C. Rule 3745-59-07(A) (2) (b); 40 CFR 268.7(a) (2) (ii)]

* see comments next page

Y

N

Y

Y

Y

N/A

9. Is the notification/certification identified in Question #8 submitted with each shipment of waste? [O.A.C. 3745-59-07 (A) (2); 40 CFR 268.7(a) (2)]

10. **For wastes subject to a case-by-case extension, exemption or a variance:** Does the generator provide written notice to the facility receiving the waste that the waste is not prohibited from land disposal? [O.A.C. Rule 3745-59-07 (A) (3); 40 CFR 268.7(a) (3)]

If so, does the notice contain the following information:

- (a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07 (A) (3) (a); 40 CFR 268.7(a) (3) (i)]
- (b) The corresponding treatment standard and applicable prohibitions? [O.A.C. Rule 3745-59-07 (A) (3) (b); 40 CFR 268.7(a) (3) (ii)]
- (c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07 (A) (3) (c); 40 CFR 268.7(a) (3) (iii)]
- (d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07 (A) (3) (d); 40 CFR 268.6(a) (3) (iv)]
- (e) The date the waste is subject to the prohibitions? [O.A.C. Rule 3745-59-07 (A) (3) (e); 40 CFR 268.7(a) (3) (v)]

11. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least five years? [O.A.C. Rule 3745-59-07 (A) (6); 40 CFR 268.7(a) (7)]

REMARKS

* 2 LDR forms incorrect for different loads than shipped

06072 - LDR for F002/F003/F005/D001
not for F001/D040

06075 - the same

N # 00050
no LDR
Chemtron

Revised: 1/7/91

REMARKS - GENERAL INFORMATION

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling procedures:

EKco manufactures silicon coated bakeware

They generate:

- ① F001 - still bottom wastes
- ② D001, F003, F005 - Paint booth sludge
- ③ D001 - chlorinated scrap batch mixes
- ④ F003, F005 - Paint booth water
- ⑤ D001, F003, F005 - Paint booth floor
- ⑥ D001, F005 - silicon paint waste
- ⑦ D001 - S-K parts washer.

The facility has an unpermitted surface impoundment.
The closure plan for this is still in adjudication

This inspection did not include groundwater requirements

GENERATOR CLASSIFICATION (OAC 3745-52-34)

Does the facility:

1. Generate < 100 Kg (25-30 gallons) of hazardous waste in a calendar month?

(yes) _____ (no) ✓

If so, the facility is classified as a Conditionally Exempt Small Quantity Generator, unless 3.b. applies. Please complete the Conditionally Exempt Small Quantity Generator Requirements checklist.

2. Generate between 100 and 1000 Kg of hazardous waste in a calendar month? (about 25 to under 300 gallons)

(yes) _____ (no) ✓

If so, the facility is classified as a Small Quantity Generator, unless 3.b. applies. Please stop here and complete the Small Quantity Generator Requirements checklist.

3. a. Generate > 1000 Kg (~ 300 gallons) of hazardous waste in a calendar month?

OR;

- b. Generate > 1 Kg of acutely hazardous waste in a calendar month?

(yes) ✓ (no) _____

If so, the facility is classified as a Large Quantity Generator. Please complete the Large Quantity Generator Requirements checklist.

REMARKS - GENERATOR CLASSIFICATION

FACILITY INSPECTION WASTE MANAGEMENT ACTIVITIES SUMMARY

1, 2, 3 & 4 all go
in the same tote

DESCRIPTION OF WASTE

ON SITE MANAGEMENT

OFF SITE MANAGEMENT

| EPA WASTE CODE | QTY GEN PER MO. | PROCESS/ACTIVITY GENERATING WASTE | GENERATOR | | | T S D | TYPE OF ON-SITE TREATMENT (WHERE APPLICABLE) | RECYCLED | CONTAINER | IMPOUNDMENT | TANK | WASTE PILE | LANDFILL | DESCRIPTION OF OFF SITE MANAGEMENT <i>Van Waters + Rogers Broker</i> | |
|-------------------------------|--------------------------|--|----------------------------|-----------------------------|-----------------------------|-------------|---|----------|-------------------|-------------|------|---------------|----------|---|---|
| | | | LESS THAN 90 DAYS | LESS THAN 180 DAYS | LESS THAN 270 DAYS | | | | | | | | | | |
| <i>FO01</i> | | still bottom wastes | ✓ | | | | | | ✓ | | | | | Systech - for cement Kiln. | ① |
| <i>DO01 FO03 FO05</i> | | Paint booth sludge | ✓ | | | | | | ✓ | | | | | Systech - for cement Kiln | ② |
| <i>DO01</i> | | Chlorinated scrap batch mixes | ✓ | | | | | | ✓ | | | | | Systech - for cement Kiln | ③ |
| <i>FO03 FO05</i> | | Paint booth water | ✓ | | | | | | ✓ | | | | | Shipped to Environmental Tricil Industries Services, Inc. - Hilliard | |
| <i>DO01 FO03 FO05</i> | | Paint booth floor | ✓ | | | | | | <i>drums</i> ✓ | | | | | Ross Incinerator | |
| <i>DO01 FO05</i> | | silicon paint wastes | ✓ | | | | | | ✓ | | | | | Systech - for cement- kiln | ④ |
| <i>DO01</i> | | Safety-Kleen parts washer (petroleum naphtha) | ✓ | | | | | | ✓ | | | | | Safety-Kleen - Kent | |
| <i>FO01 DO01</i> | | From degreaser - TCE and water | | | | | Pumped thru on site air stripper | | | | | | | | |

OAC 3745-52 - LARGE QUANTITY GENERATOR REQUIREMENTS

WASTE EVALUATION (OAC 3745-52-11)

Y/N/NA RMK #

1. Have wastes generated at the facility been evaluated in compliance with the waste evaluation requirements of OAC rule 3745-52-11(A) (B) and (C)?

Y _____

If not, specify those waste streams which the generator has failed to adequately evaluate:

2. Are any wastes generated at the facility identified by the generator as being excluded from regulation under Rule 3745-51-04?

Y _____

If so, specify those waste streams identified by the generator as being excluded under 3745-51-04:

*Paint booth water - non haz - non-tox.
the solvent not being directly added to water -
it's just a by-product*

3. Is the facility generating any wastes which are identified as recyclable materials as defined in OAC 3745-51-06?

Y _____

If so, please identify these waste streams below:

*degreaser still bottoms
+ CE being reclaimed - distillation &
carbon absorption*

4. Is the generator recycling any materials on-site by:
- Using or reusing the material as an ingredient in an industrial process to make a product?
 - If so, is the material being reclaimed before it is used or reused?
 - Using the material as a substitute for commercial products?
 - Returning the material to the original process from which it was generated as a substitute for a raw material feedstock?
 - If so, is the material reclaimed before returning to the original process?

Y
Y
Y
Y
Y

Please identify those materials that the generator is recycling as described in 4.a., 4.b. and/or 4.c. below:

TCE

5. Has the generator identified any waste treatment activity as being excluded from regulation because of totally enclosed treatment or via operation of an elementary neutralization unit and/or wastewater treatment unit as described in Rule 3745-65-01?

N

If so, specify those waste treatment activities which the generator has identified as being excluded from regulation:

6. Are Land Disposal Restricted (LDR) wastes being generated? If so, complete the Land Disposal Restriction Checklist.

Y

GENERATOR IDENTIFICATION NUMBER (OAC 3745-52-12)

7. Prior to treating, storing, disposing, transporting or offering to transport hazardous waste, has the generator obtained a generator identification number from USEPA as required by 3745-52-12?

Y

GENERATOR ANNUAL REPORT (OAC 3745-52-41)

8. Has the generator filed annual reports to the Director on or before March 1st of each calendar year as required by 3745-52-41?

Y

HAZARDOUS WASTE IMPORT/EXPORT (OAC 3745-52-50 TO 3745-52-57
AND OAC 3745-52-60)

Y/N/NA RMK #

9. Does the generator import or export hazardous waste?

N _____

If so, are the wastes handled in accordance with the
requirements of 3745-52-50 through 3745-52-57 and
3745-52-60?

NA _____

REMARKS - HAZARDOUS WASTE IMPORT/EXPORT

PRE-TRANSPORT REQUIREMENTS (OAC 3745-52-30 TO 3745-52-33)

Y/N/NA RMK #

10. Does the generator meet the following pre-transport
requirements prior to offering hazardous wastes for
transport off-site:

a. The waste material is packaged, labeled, and marked
in accordance with the applicable DOT regulations
[3745-52-30, 3745-52-31, and 3745-52-32]?

Y _____

b. Each container with a capacity of 110 gallons or less
is affixed with a completed hazardous waste label as
required by 3745-52-32?

Y _____

c. The generator meets the requirements for proper DOT
placarding or offers the appropriate DOT placards to
the initial transporter in compliance with 3745-52-33?

Y _____

REMARKS - PRETRANSPORT REQUIREMENTS

CONTINGENCY PLAN (OAC 3745-65-50 THROUGH 3745-65-56)

Y/N/NA RMK #

1. Does the o/o have a written Contingency Plan which contains the following? [3745-65-52 (A) (B) (C) (D) (E)]:
 - a. Actions to be taken by personnel in the event of an emergency incident? Y _____
 - b. Arrangements or agreements with local or state emergency authorities? Y _____
 - c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator? Y _____
 - d. A list of all emergency equipment including location, physical description and outline of capabilities? Y _____
 - e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52 (F)]? Y _____
2. Is the Contingency Plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste or hazardous waste constituents to air, soil or surface water? [3745-65-51 (A)] Y _____
3. Is a copy of the Contingency Plan and any plan revisions maintained on-site and has it been submitted to all local and state emergency service authorities that might be required to participate in execution of the plan? [3745-65-53 (A) (B)] Y _____
4. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] Y _____
5. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-55] Y _____

Y/N/NA RMK #

6. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the actions and made all of the notifications necessary under 3745-65-56(A-J)?

N

REMARKS - CONTINGENCY PLAN REQUIREMENTS

PERSONNEL TRAINING (OAC 3745-65-16)

Y/N/NA RMK #

1. Does the generator provide a Personnel Training Program in compliance with 3745-65-16(A) (B) (C) including instruction in safe equipment operation and emergency procedures, and implementation of the contingency plan? [3745-52-34(A) (4)] Y _____
2. Does the generator provide Personnel Training to new employees within 6 months after the date of employment as required by 3745-65-16(B)? [3745-52-34(A) (4)] Y _____
3. Does the generator provide an annual refresher training course as required by 3745-65-16(B)? [3745-52-34(A) (4)] Y _____
4. Does the generator keep all the records required by 3745-65-16(D) (E) including; written job titles, job descriptions and documented employee training records? [3745-52-34(A) (4)] Y _____

REMARKS - PERSONNEL TRAINING REQUIREMENTS

OAC 3745-67 SURFACE IMPOUNDMENTS

Y/N/NA RMK #

1. Is at least 2 feet (60 cm) of freeboard maintained in the surface impoundment, or has written certification that the impoundment is of adequate design been prepared? [3745-67-22]
2. Are earthen structural containment systems equipped with protective cover such as grass, shale or rock to minimize erosion from wind and water? [3745-67-23]
3. Is the level of freeboard in the surface impoundment inspected at least once each operating day? [3745-67-26(A)]
4. Is the structural containment system inspected at least once per week? [3745-67-26(B)]
5. Are the inspections noted in Question 4 and 5 documented?

NA
Y
NA
Y
Y

MANAGEMENT OF IGNITABLE/REACTIVE WASTE IN SURFACE IMPOUNDMENTS

Y/N/NA RMK #

6. Whenever a surface impoundment is used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the surface impoundment, has the facility insured the safety of such changes by: [3745-67-25]
 - a. Waste analyses and trial treatment? or;
 - b. Written documented information on similar treatment of similar waste under similar conditions?
7. With the exception of emergency situations, whenever ignitable or reactive wastes are placed in a surface impoundment, has the facility insured the safety of the operation by complying with the following: [3745-67-29 and 3745-65-17]
 - a. The waste is immediately treated after placement in the surface impoundment so that it is no longer hazardous?
 - b. The waste is managed to protect from ignition?
 - c. A certification from a qualified chemist or engineer is maintained at the facility stating that the design/operation of the unit will prevent ignition or reaction?
8. Is the placement of incompatible waste materials in the same surface impoundment done in compliance with the safety requirements of 3745-65-17? [3745-67-30]

NA
+
+
+
+
V

Y/N/NA RMK #

9. At closure, were all standing liquids, waste residues, liners, and contaminated soil removed from the unit?
[3745-67-28]

NA _____

10. Has the owner/operator retrofitted the surface impoundment or ceased receipt of hazardous waste by November 8, 1988?

↓ _____
↓ _____

If no, did USEPA grant an exemption prior to that date?

NOTE: IF THE OPERATOR ELECTS NOT TO EXEMPT THE SURFACE IMPOUNDMENT FROM FURTHER REGULATION BY REMOVING ALL WASTE MATERIALS, THE SURFACE IMPOUNDMENT IS SUBJECT TO THE POST-CLOSURE CARE AND GROUND WATER MONITORING REQUIREMENTS SPECIFIED IN 3745-68-10 AND 3745-67-28(C).

REMARKS - SURFACE IMPOUNDMENT REQUIREMENTS

USE AND MANAGEMENT OF CONTAINERS (OAC 3745-66-70 TO 3745-66-77)

Y/N/NA RMK #

1. Are hazardous wastes stored in containers which are:
 - a. Closed? [3745-66-73(A)] Y _____
 - b. In good condition? [3745-66-71] Y _____
 - c. Compatible with wastes stored in them? [3745-66-72] Y _____
2. Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)] Y _____
3. Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)] Y _____
4. Is the area where containers are stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74] Y _____
5. Is the facility recording inspections described in Question #4 in an inspection log or inspection summary as required by OAC 3745-66-74(B) which contains the following information:
 - a. Date and time of inspections? Y _____
 - b. Name of inspector? Y _____
 - c. Notation of observations made during the inspection? Y _____
 - d. The date and nature of any repairs or other remedial action? Y _____
6. Are ignitable and/or reactive hazardous waste(s) being managed at the facility? If so, Y _____
 - a. Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Y _____
 - b. Are containers holding hazardous wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] Y _____

REMARKS - CONTAINER MANAGEMENT REQUIREMENTS

GENERATOR CLOSURE REQUIREMENTS (3745-52-34)

Y/N/NA RMK #

1. Has the generator closed any < 90-day accumulation unit(s) since date of last inspection? N _____

If so, describe the unit(s) which the generator has closed:

2. If the generator has closed any < 90-day accumulation unit(s) as described in Question #1, was closure completed to meet the closure performance standard of 3745-66-11? [3745-52-34 (A) (1)] NA _____

Please provide a description of the type of documentation provided by the generator to confirm that closure was completed in accordance with the closure performance standard:

REMARKS - GENERATOR CLOSURE REQUIREMENTS

TOXICITY CHARACTERISTIC (TC) RULE REQUIREMENTS

WASTE EVALUATION (GENERATOR REQUIREMENT)

Y/N N/A RMR#

1. Has the generator evaluated all wastes to determine if they exhibit any of the toxicity characteristics as defined in 40 CFR 262.24? [40 CFR 262.11] *Booth sludge, chlorinated paint waste & maybe the industrial waste water* Y
- (a) Did the generator use knowledge of the process to determine if wastes exhibit any of the toxicity (TC) characteristics? OR; Y
- (b) Did the generator obtain a chemical analysis of the wastes to determine if the wastes demonstrate any of the toxicity (TC) characteristics? Y

NOTE: If the generator has obtained a chemical TC analysis of the wastes, please attach a copy of the analytical results to this checklist.

2. Please identify which of the following TC wastes are being managed at the facility:

TC METAL WASTES

| | | |
|----------------------------|-----------------------------|-----------------------------|
| <u> </u> D004 (Arsenic) | <u> </u> D007 (Chromium) | <u> </u> D010 (Selenium) |
| <u> </u> D005 (Barium) | <u> </u> D008 (Lead) | <u> </u> D011 (Silver) |
| <u> </u> D006 (Cadmium) | <u> </u> D009 (Mercury) | |

TC PESTICIDE WASTES

| | | |
|----------------------------|---------------------------------|-----------------------------|
| <u> </u> D012 (Endrin) | <u> </u> D014 (Methoxychlor) | <u> </u> D016 (2,4-D) |
| <u> </u> D013 (Lindane) | <u> </u> D015 (Toxaphene) | <u> </u> D017 (2,4,5-TP) |

TC ORGANIC WASTES

| | |
|---|--|
| <u> </u> D018 (Benzene) | <u> </u> D031 (Heptachlor) |
| <u> </u> D019 (Carbon tetrachloride) | <u> </u> D032 (Hexachlorobenzene) |
| <u> </u> D020 (Chlordane) | <u> </u> D033 (Hexachlorobutadiene) |
| <u> </u> D021 (Chlorobenzene) | <u> </u> D034 (Hexachloroethane) |
| <u> </u> D022 (Chloroform) | <u>✓</u> D035 (Methyl ethyl ketone) |
| <u> </u> D023 (o-Cresol) | <u> </u> D036 (Nitrobenzene) |
| <u> </u> D024 (m-Cresol) | <u> </u> D037 (Pentachlorophenol) |
| <u> </u> D025 (p-Cresol) | <u> </u> D038 (Pyridine) |
| <u> </u> D026 (Cresol) | <u> </u> D039 (Tetrachloroethylene) |
| <u> </u> D027 (1,4-Dichlorobenzene) | <u>✓</u> D040 (Trichloroethylene) |
| <u> </u> D028 (1,2-Dichloroethane) | <u> </u> D041 (2,4,5-Trichlorophenol) |
| <u> </u> D030 (2,4-Dinitrotoluene) | <u> </u> D042 (2,4,6-Trichlorophenol) |
| | <u> </u> D043 (Vinyl chloride) |

3. Please identify below, how the facility is managing TC hazardous wastes:

| GENERATOR ACCUMULATION (< 90 DAYS) | STORAGE (> 90 DAYS) | ON-SITE TREATMENT | ON-SITE DISPOSAL |
|---|--------------------------------------|--------------------------------------|---|
| <input checked="" type="checkbox"/> Container | <input type="checkbox"/> Container | <input type="checkbox"/> Tank | <input type="checkbox"/> Injection Well |
| <input type="checkbox"/> Tank | <input type="checkbox"/> Tank | <input type="checkbox"/> Incinerator | <input type="checkbox"/> Surface |
| | <input type="checkbox"/> Waste Pile | <input type="checkbox"/> Other | <input type="checkbox"/> Impoundment |
| | <input type="checkbox"/> Surface | | <input type="checkbox"/> Land Application |
| | <input type="checkbox"/> Impoundment | | |

PART A APPLICATION REQUIREMENTS

Y/N N/A RMK#

4. For TSD facilities: Does the company have available, a copy of its Part A permit application which has been revised to reflect TC waste codes?

NA

If so, please obtain a copy and attach to this checklist.

5. If the company does not have a revised Part A available, does the facility representative indicate that a revised Part A application has been filed with U.S. EPA?

NA

RECORDKEEPING REQUIREMENTS

6. Is the owner/operator in compliance with the 40 CFR Part 264 and Part 265 recordkeeping requirements applicable to the management of TC waste?

Y

If not, please identify below the specific 40 CFR violations or potential 40 CFR violations occurring:

STRUCTURAL/OPERATING REQUIREMENTS

Y/N N/A RMK#

7. Is (are) the unit(s) used to manage TC hazardous waste in compliance with the structural and operating requirements of 40 CFR Part 264 and Part 265? Y

If not, please identify below the specific 40 CFR violations or potential 40 CFR violations occurring:

OPERATION/MAINTENANCE REQUIREMENTS

Y/N N/A RMK#

8. Is the owner/operator complying with 40 CFR Part 264 and Part 265 operation and maintenance requirements to ensure the proper management of TC hazardous wastes? Y

If not, please identify below the specific 40 CFR violations or potential 40 CFR violations occurring:

MANIFEST REQUIREMENTS (OAC 3745-52-20 TO 3745-52-23)

Y/N/NA RMK #

1. Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:
 - a. All hazardous wastes shipped off-site have been accompanied by a completed manifest, USEPA form 8700-22 in compliance with 3745-52-20 (A)?
 - b. The manifest contains all information required by 3745-52-20 and the minimum number of copies required by 3745-52-22?
 - c. The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20 (C) (D) (E)?
 - d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23 (A) (1) (2)?
2. Has the generator received a return copy of each completed manifest within thirty-five (35) days of the date the waste was accepted by the initial transporter?
 - a. If not, has the generator complied with the Manifest Exception reporting requirements in 3745-52-42?
3. Are signed copies of all hazardous waste manifests and any documentation required for Exception Reports retained for at least 3 years as required by 3745-52-40?

| | |
|-----|-------|
| Y | _____ |
| Y | _____ |
| Y | _____ |
| Y | _____ |
| Y | _____ |
| N/A | _____ |
| Y | _____ |

REMARKS - MANIFEST REQUIREMENTS

OAC CHAPTER 3745-59 (40 CFR PART 268) - LDR GENERAL REQUIREMENTS

CASE-BY-CASE EXTENSIONS

Y/N/NA RMK#

1. Has the entity received an extension for compliance with land disposal restrictions from US EPA in accordance with O.A.C. Rule 3745-59-05 (40 CFR 268.5)? If yes,

N/A

(a) List the waste(s) affected:

(b) Has such an extension been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-05(C)]

N/A

(c) When does the extension expire? _____

NOTE: A case-by-case extension can be granted for up to one year. The extension is renewable once (by US EPA) for an additional year.

VARIANCE FROM A TREATMENT STANDARD

2. Has the entity been granted a variance from an LDR treatment standard by US EPA as allowed by O.A.C. Rule 3745-59-44 (40 CFR 268.44)? If yes,

N/A

(a) List the waste(s) affected:

(b) Has the petition been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-44(C)]

N/A

NOTE: Until the extension or variance identified in Questions 1 or 2 has been recognized by the Director of the Ohio EPA, the entity must continue to manage the waste in compliance with the LDR requirements. [See O.A.C. Rules 3745-59-05(C) and 3745-59-44(C)]

NO MIGRATION PETITION

Y/N/NA RMK#

3. Has the entity petitioned US EPA for a variance to allow for continued land disposal of untreated LDR wastes based upon a demonstration that there will be no migration from the disposal unit as specified in O.A.C. Rule 3745-59-06 (40 CFR 268.6)?
If yes,

N/A

(a) List the waste(s) affected:

(b) Has the entity's "no migration" demonstration been approved by US EPA?



NOTE: Until receiving approval of the petition by US EPA, the entity must comply with all LDR requirements applicable to the petitioned waste(s). No approval or recognition of the petition by the Director of the Ohio EPA is required. [O.A.C. Rule 3745-59-06; 40 CFR 268.6]

PROHIBITION AGAINST DILUTION

4. In compliance with O.A.C. Rule 3745-59-03 (40 CFR 268.3), does the entity prohibit the dilution of a restricted waste or treatment residue from a restricted waste:

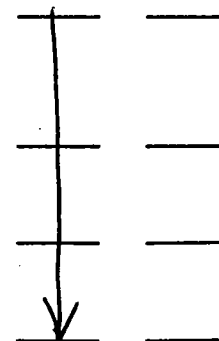
(a) As a substitute for adequate treatment to achieve compliance with LDR treatment standards?

(b) To circumvent the effective date of a prohibition (e.g. to dilute a "non-wastewater" waste to a "wastewater" to avoid complying with the "non-wastewater" treatment standard)?

(c) To otherwise avoid a prohibition in O.A.C. Rules 3745-59-30 through 3745-59-33? (40 CFR 268.30 through 268.33)

(d) To otherwise avoid a prohibition imposed by Section 3004 of RCRA?

N/A



NOTE: Dilution of wastes is permissible under the following conditions:

- i. The entity dilutes a characteristic only hazardous waste in a wastewater treatment system which treats wastes subsequently discharged pursuant to a permit issued under section 402 of Clean Water Act or which treats wastes for purposes of pretreatment under section 307 of the Clean Water Act; and,
- ii. No other method of treatment has been specified as the treatment standard for the waste. (See 40 CFR 268.3)

LDR - GENERATOR REQUIREMENTS

NOTE: The following requirements apply only to large quantity generators and small quantity generators. Conditionally exempt small quantity generators are exempt from land disposal restriction requirements as referenced in O.A.C. Rules 3745-59-01(C) (3) (40 CFR 261.8(e) (1)) and 3745-51-05(B) (40 CFR 261.5(b)).

EVALUATION OF WASTES/DETERMINING APPROPRIATE TREATMENT STANDARDS

Y/N/NA RMK#

1. Has the generator adequately evaluated all wastes generated to determine if the wastes are restricted from land disposal under O.A.C. Chapter 3745-59 (40 CFR Part 268)? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]

Y _____

 - (a) For determinations based ~~solely~~ on knowledge of the waste: Is supporting data used to make this determination being retained on-site? [O.A.C. Rule 3745-59-07(A) (5); 40 CFR 268.7(a) (5)]

Y _____
 - (b) For determinations based upon analytical testing of the waste: Is a copy of waste analysis data being retained on-site? [O.A.C. Rule 3745-59-07(A) (5); 40 CFR 268.7(a) (5)]

Y _____
2. Has the generator determined the correct "treatability group" for each waste restricted from land disposal (e.g. wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)?

Y _____
3. Has the generator determined if restricted wastes meet or exceed treatment standards? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]

Y _____

REMARKS

4. Does the generator generate waste mixtures that are subject to two or more different treatment standards? If so, ~~N~~ N
- (a) For mixed waste streams containing two or more concentration based treatment standards: Has the generator applied the more stringent treatment standard as the treatment standard for the mixture? [O.A.C. Rules 3745-59-41(B) and 3745-59-43(B); 40 CFR 268.41(b) and 268.43(b)] NA
5. Does the facility generate any listed waste(s) which are restricted from land disposal? If so, Y
- (a) Do such wastes also exhibit hazardous waste characteristics as identified in 40 CFR 262.11? Y
- (b) For listed wastes which also exhibit characteristic(s), does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [40 CFR 268.9] NA

TREATMENT OF CHARACTERISTIC HAZARDOUS WASTE

6. Does the generator treat any characteristic hazardous waste(s) in a RCRA-exempt unit to render such wastes non-hazardous? If so, N *HAZARDOUS WASTE*
- (a) Are treated waste(s) sent to a licensed solid waste disposal facility? If so, N/A
- i. With each shipment of waste, does the generator submit a notification and certification to the Regional Administrator which contains the following information:
- a. Name and address of the solid waste facility receiving the waste? [40 CFR 268.9(d)(1)(i)] NA
- b. A description of the waste as initially generated, including EPA hazardous waste numbers and the treatability group? [40 CFR 268.9(d)(1)(ii)] N/A
- c. The treatment standards applicable at the initial point of generation? [40 CFR 268.9(d)(1)(iii)] N/A
- ii. Is the certification signed by an authorized representative and does it contain the language in 40 CFR 268.7(b)(5)(i)? [40 CFR 268.9(d)(2)] N/A

NOTE: An example of a RCRA-exempt unit would include an elementary neutralization unit or a wastewater treatment unit as defined by O.A.C. Rule 3745-50-10. [See O.A.C. Rule 3745-65-01]

NOTIFICATION/CERTIFICATION

Y/N/NA RMK#

7. For wastes that do not meet treatment standards: Does the generator notify the treatment or storage facility receiving the wastes, in writing, that wastes being received do not meet treatment standards? [O.A.C. Rule 3745-59-07(A) (1); 40 CFR 268.7(a) (1)]
- (a) Is such notification provided with each shipment of waste? [O.A.C. Rule 3745-59-07(A) (1); 40 CFR 268.7(a) (1)]
- (b) Does the notification contain the following information:
- i. EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A) (1) (a); 40 CFR 268.7(a) (1) (i)]
 - ii. Appropriate treatment standard for each waste? [O.A.C. Rule 3745-59-07(A) (1) (b); 40 CFR 268.7(a) (1) (ii)]
 - iii. The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A) (1) (c); 40 CFR 268.7(a) (1) (iii)]
 - iv. Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A) (1) (d); 40 CFR 268.7(a) (1) (iv)]
8. For wastes that meet treatment standards: Does the generator submit a written notice and certification to the treatment, storage or disposal facility receiving the waste stating that the wastes being received meet applicable treatment standards? [O.A.C. Rule 3745-59-07(A) (2); 40 CFR 268.7(a) (2)]
- If so, does the notice include the following information:
- (a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A) (2) (a) (i); 40 CFR 268.7(a) (2) (i) (A)]
 - (b) The corresponding treatment standards and applicable prohibitions for the waste? [O.A.C. Rule 3745-59-07(A) (2) (a) (ii); 40 CFR 268.7(a) (2) (i) (B)]
 - (c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A) (2) (a) (iii); 40 CFR 268.7(a) (2) (i) (C)]
 - (d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A) (2) (a) (iv); 40 CFR 268.7(a) (2) (i) (D)]
 - (e) Is the certification signed by the generator or an authorized representative? [O.A.C. Rule 3745-59-07(A) (2) (b); 40 CFR 268.7(a) (2) (ii)]

Y _____Y _____Y _____Y _____Y _____Y _____N/A _____↓ _____

9. For wastes subject to a case-by-case extension, an exemption or a variance: Does the generator provide a written notice to the facility receiving the waste that the waste is not prohibited from land disposal? [O.A.C. Rule 3745-59-07(A) (3); 40 CFR 268.7(a) (3)]

N/A

If so, does the notice contain the following information:

- (a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07 (A) (3) (a); 40 CFR 268.7(a) (3) (i)]
 - (b) The corresponding treatment standard and applicable prohibitions? [O.A.C. Rule 3745-59-07(A) (3) (b); 40 CFR 268.7(a) (3) (ii)]
 - (c) The manifest number associated with the shipment of waste? [O.A.C. 3745-59-07(A) (3) (c); 40 CFR 268.7(a) (3) (iii)]
 - (d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A) (3) (d); 40 CFR 268.7(a) (3) (iv)]
 - (e) The date the waste is subject to the prohibitions? [O.A.C. Rule 3745-59-07(A) (3) (e); 40 CFR 268.7(a) (3) (v)]
10. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least five years? [3745-59-07(A) (6); 40 CFR 268.7(a) (6)]

REMARKS

LDR - TREATMENT FACILITY REQUIREMENTS

REQUIRED TREATMENT

Y/N/NA

RMK#

1. Does the facility treat any restricted wastes for which a treatment standard based upon a treatment technology has been established?

N/A

(a) If so, is the facility using the appropriate treatment technology as specified in O.A.C. 3745-59-42 (40 CFR 268.42)?

(b) If not, has US EPA granted the facility approval to use an alternative treatment method other than the required technology? [3745-59-42(B) and 40 CFR 268.42(b)]

2. Does the facility treat restricted wastes for which a concentration based treatment standard has been established?

If so, does the treatment facility test its waste treatment residues according to the following requirements:

(a) For wastes with treatment standards expressed as a concentration in the waste extract (OAC 3745-59-41; 40 CFR 268.41):

Following treatment, does the treatment facility test the treatment residues or an extract of such residues using the TCLP test to assure that the residues or extract meet the applicable treatment standard? [3745-59-07(B) (1); 268.7(b) (1)]

(b) For wastes with treatment standards expressed as concentrations in the waste (OAC 3745-59-43; 40 CFR 268.43):

Does the treatment facility test the treatment residues (not an extract of such residues) using a total constituent analysis to assure that the residues meet applicable treatment standards? [3745-59-07(B) (3); 40 CFR 268.7(b) (3)]

NOTE: A treatment facility may use any treatment method available (except impermissible dilution) to treat restricted wastes which have concentration based treatment standards (unless the waste is a mixture which includes wastes with concentration based treatment standards and technology based treatment standards - in which case the technology based treatment standard must be used).

OFF-SITE SHIPMENTS - NOTIFICATION/CERTIFICATION REQS.

Y/N/NA RMK#

3. For all restricted wastes: Does the treatment facility have hazardous waste and/or treatment residues shipped off-site for land disposal?

N/A

If so, does the treatment facility provide the land disposal facility with a written notice containing the following information:

- (a) EPA hazardous waste number? [3745-59-07(B) (4) (a); 268.7(b) (4) (i)]
- (b) The corresponding treatment standards and applicable prohibitions for each waste? [3745-59-07(B) (4) (b); 268.7(b) (4) (ii)]
- (c) The manifest number associated with the shipment of waste? [3745-59-07(B) (4) (c); 268.7(b) (4) (iii)]
- (d) Waste analysis data, where available? [3745-59-07(B) (4) (d); 268.7(b) (4) (iv)]

4. Does the facility have any wastes and/or treatment residues shipped off-site for disposal which have been generated from treatment of a restricted waste to meet treatment standards? If so,

For wastes and/or treatment residues which have been generated from treatment of a waste which has a concentration based treatment standard:

- (a) Does the treatment facility also submit a written certification with each shipment of waste or treatment residue stating that the waste has been treated in compliance with applicable treatment standards? [3745-59-07(B) (5); 268.7(b) (5)]
- (b) Does the certification contain the language as required by O.A.C. Rule 3745-59-07(B) (5) (a); 40 CFR 268.7(b) (5) (i)]

For wastes and/or treatment residues which have been generated from treatment of a waste which has a technology based treatment standard:

- (c) With each shipment of treatment residue shipped off-site for disposal, does the treatment facility submit a certification stating that the residue has been treated in accordance with the appropriate treatment technology as specified in O.A.C. Rule 3745-59-42 (40 CFR 268.42) [3745-59-07(B) (5) (b); 40 CFR 268.7(b) (5) (ii)]
- (d) Is the certification signed by an authorized representative and does it contain the language as specified in O.A.C. 3745-59-07(5) (b) (ii) (40 CFR (b) (5) (ii))?

✓

5. Does the treatment facility have wastes shipped off-site that do not meet treatment standards and/or wastes that must be further managed at a different treatment or storage facility? If so,

N/A

- (a) Is the facility complying with the generator notification and certification requirements of O.A.C. Rule 3745-59-07 (40 CFR 268.7)? [3745-59-07(B)(6); 268.7(b)(6)]

TREATMENT OF CHARACTERISTIC HAZARDOUS WASTE (40 CFR 268.9)

6. Does the facility treat any characteristic hazardous waste(s) to render such wastes non-hazardous? If so,

- (a) Are treated waste(s) sent to a licensed solid waste disposal facility? If so,

- i. With each shipment of waste, does the facility submit a notification and certification to the Regional Administrator which contains the following information:

- a. Name and address of the solid waste facility receiving the waste? [40 CFR 268.9(d)(1)(i)]
- b. A description of the waste as initially generated, including EPA hazardous waste numbers and the treatability group? [40 CFR 268.9(d)(1)(ii)]
- c. The treatment standards applicable at the initial point of generation? [40 CFR 268.9(d)(1)(iii)]

- (b) Is the certification signed by an authorized facility representative and does it contain the language found in 40 CFR 268.7(b)(5)(i)? [40 CFR 268.9(d)(2)]

REMARKS

LDR - LAND DISPOSAL FACILITY REQUIREMENTS

Y/N/NA RMK#

1. Does the land disposal facility retain copies of notices and certifications required by O.A.C. Rule 3745-59-07(A) or (B) (40 CFR 268.8(a) or (b)) and O.A.C. Rule 3745-59-08 (40 CFR 268.8)? [O.A.C. Rule 3745-59-07(C) (1); 40 CFR 268.7(c) (1)]
2. Does the land disposal facility test the waste or an extract of the waste or treatment residue received in accordance with the facility's waste analysis plan to assure that the wastes or treatment residues are in compliance with applicable treatment standards? [O.A.C. Rule 3745-59-07(C) (2); 40 CFR 268.7(c) (2)]
3. Does the land disposal facility prohibit the disposal of restricted wastes or treatment residues which exceed the concentration based treatment standards of O.A.C. Rules 3745-59-41 (40 CFR 268.41) or 3745-59-43 (40 CFR 268.43)? [O.A.C. Rule 3745-59-40(A), (C); 40 CFR 268.40(a), (c)]
4. Does the land disposal facility prohibit the disposal of any restricted wastes or treatment residues before such wastes have been treated using the technology required by O.A.C. Rule 3745-59-42(A) (40 CFR 268.42(a))? [O.A.C. Rule 3745-59-40(B); 40 CFR 268.40(b)]

N/A

REMARKS

TREATMENT OF LDR WASTES IN SURFACE IMPOUNDMENTS

Y/N/NA RMK#

1. Does the owner/operator treat wastes which are prohibited from land disposal in a surface impoundment or series of impoundments? If so, are the following conditions met:
- (a) The residues from treatment are analyzed to determine if they meet applicable treatment standards? [O.A.C. Rule 3745-59-04(A) (2) (a); 40 CFR 268.4(a) (2) (i)]
- (b) The sampling method is designed so that representative samples of the sludge and the supernatant are tested separately rather than mixed to form homogeneous samples? [O.A.C. Rule 3745-59-04(A) (2) (a); 40 CFR 268.4(a) (2) (i)]
- (c) Treatment residues (including any liquid waste) which do not meet treatment standards or prohibition levels are removed from the impoundment at least annually? [O.A.C. Rule 3745-59-04(A) (2) (b); 40 CFR 268.4(a) (2) (ii)]
- i. Such residues are not placed in any other surface impoundment? [O.A.C. Rule 3745-59-04(A) (2) (c); 40 CFR 268.4(a) (2) (iii)]
- (d) Procedures and schedules for sampling the impoundment contents, analysis of test data and removal of residues which do not meet treatment standards have been established? [O.A.C. Rule 3745-59-04(A) (2) (d); 40 CFR 268.4(a) (2) (iv)]
- i. Such procedures and schedules are specified in the facility's waste analysis plan as required by O.A.C. Rules 3745-65-13 (40 CFR 265.13) or 3745-54-13 (40 CFR 264.13)? [O.A.C. Rule 3745-59-04(A) (2) (d); 40 CFR 268.4(a) (2) (iv)]
- ii. A copy of the waste analysis plan has been submitted to the Director? [O.A.C. Rule 3745-59-04(A) (4); 40 CFR 268.4(a) (4)]
- (e) The impoundment meets the design requirements of O.A.C. Rule 3745-56-21(C) (40 CFR 264.221(c)) or 3745-67-21(A) (40 CFR 265.221(a))? [O.A.C. Rule 3745-59-04(A) (3); 40 CFR 268.4(a) (3)]
- (f) The impoundment meets groundwater monitoring requirements (unless exempt from such requirements)? [O.A.C. Rule 3745-59-04(A) (3); 40 CFR 268.4(a) (3)]

N/A

↓

NOTE: A TSD facility may store Land Disposal Restricted wastes on-site for the purpose of accumulating a sufficient amount of waste for proper recovery, treatment or disposal. [O.A.C. Rule 3745-59-50(B); 40 CFR 268.50(b)] During the first year of storage, the burden of proof is on Ohio EPA to demonstrate that such storage is not necessary by the facility. Following one year, the burden of proof shifts to the storage facility to demonstrate that such storage of LDR wastes is necessary to facilitate proper recovery, treatment or disposal.

The requirements of O.A.C. Rule 3745-59-50(C) (40 CFR 268.50(c)) found in Question #3 do not apply to those facilities that store hazardous wastes containing PCBs at concentrations greater than or equal to 50 ppm. Please go to Question #4 for applicable requirements.

Y/N/NA RMK#

4. Does the owner/operator store liquid hazardous wastes which also contain PCBs at concentrations greater than or equal to 50 ppm for greater than 90 days? If so,
- (a) Does the facility meet the requirements of 40 CFR 761.65(b)? [O.A.C. Rule 3745-59-50(F); 40 CFR 268.50(f)]
- (b) Does the facility remove from storage and treat or dispose of such PCB hazardous wastes within one year from the date that the wastes were initially placed in storage? [O.A.C. Rule 3745-59-50(F); 40 CFR 268.50(f)]

N/A

| | |
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| | |

REMARKS

Y/N/NA RMK#

- (g) The owner/operator has submitted a written certification to the Director (Regional Administrator) which states that the surface impoundment meets the above requirements referenced in Questions 1(a) through (f)? [O.A.C. Rule 3745-59-04(A) (4); 40 CFR 268.4(a) (4)]

N/A

REMARKS

STORAGE OF LAND DISPOSAL RESTRICTED WASTES

NOTE: The following questions apply to operators of treatment, storage or disposal (TSD) facilities that accumulate Land Disposal Restricted wastes that do not meet treatment standards in tanks or containers. A large quantity generator who stores LDR wastes on-site for greater than 90 days becomes an operator of a storage facility and must comply with all applicable TSD requirements. SQGs become owners/operators of storage facilities if storage of LDR wastes exceeds 6,000 kg. or 180/270 days.

NOTE: The LDR storage prohibition does not apply to wastes which are subject to a national capacity variance, variance from the treatment standard or case-by-case extension during the period of extension/variance. The LDR storage prohibition also does not apply to wastes subject to a no-migration petition or to wastes which meet treatment standards. [O.A.C. Rule 3745-59-50(E); 40 CFR 268.50(e)]

Y/N/NA RMK#

1. Is the owner/operator storing land disposal restricted wastes in containers? If so, is each container marked the following information in accordance with O.A.C. Rule 3745-59-50(A) (2) (a) (40 CFR 268.50(a) (2) (i)):
 - (a) The identification of the contents?
 - (b) With the date which accumulation began?
2. Is the owner/operator storing land disposal restricted wastes in tanks? If so, is each tank marked with the following information in accordance with O.A.C. Rule 3745-59-50(A) (2) (b) (40 CFR 268.50(a) (2) (ii)):
 - (a) A description of its contents?
 - (b) The quantity of each hazardous waste received?
 - (c) The date each period of accumulation begins? or;
 - (d) Is the information required by 2(a), 2(b) and 2(c) being recorded and maintained in the facility's operating record? [O.A.C. Rule 3745-59-50(A) (2) (b); 40 CFR 268.50(a) (2) (ii)]
3. Are land disposal restricted wastes being stored at the facility for greater than one year? If so,
 - (a) Has the owner/operator demonstrated that such storage is being conducted solely for the purpose of accumulating sufficient quantities of wastes necessary to facilitate proper recovery, treatment or disposal? [O.A.C. Rule 3745-59-50(A) (1); 40 CFR 268.50(a) (1)]

N/A

PREPAREDNESS AND PREVENTION (OAC 3745-65-30 TO 3745-65-37)

Y/N/NA RMK #

1. Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31]
2. Has there been a fire, explosion or non-planned release of waste at the facility since date of last inspection?
 - a. If yes, was the contingency plan implemented? [3745-65-51(B)]
3. If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A) (B) (C) (D)]
 - a. Internal alarm system?
 - b. Access to telephone, radio or other device for summoning emergency assistance?
 - c. Portable fire control equipment, spill control and decontamination equipment?
 - d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?
4. Is all required spill control and decontamination equipment, fire and communications equipment tested on a weekly basis and maintained as necessary? [3745-65-33]
 - a. Does the facility keep an equipment testing log required by 3745-65-33(B), including date and time of test, observations made, and date and nature of any repairs?
5. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34]
6. If required due to the actual hazards associated with the waste, is adequate aisle space maintained to allow unobstructed movement of emergency or spill control equipment? [3745-65-35]
7. If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with possible hazards and facility layout? [3745-65-37(A)]

Y _____N _____NA _____Y _____Y _____N ~~Y~~ _____Y _____Y _____Y _____Y _____Y _____Y _____

Y/N/NA RMK #

8. Where state and local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented?
[OAC 3745-65-37(B)]

NA _____

REMARKS - PREPAREDNESS AND PREVENTION REQUIREMENTS

GENERATOR ACCUMULATION IN CONTAINERS AND TANKS
(OAC 3745-52-34)

Y/N/NA RMK #

1. If the generator elects to accumulate hazardous waste on-site in containers or tanks for 90 days or less without a permit as provided under 3745-52-34, are the following requirements met:

a. The containers or tanks are clearly marked with the words "Hazardous Waste"? [OAC 3745-52-34(A) (3)]

N #1

b. The date that accumulation began is clearly marked on each container? [OAC 3745-52-34(A) (2)]

N #1

In addition, OAC 3745-52-34(A) (1) also requires generators accumulating hazardous waste(s) in containers < 90 days to comply with the "Container Management" Rules of OAC 3745-66-70 to 3745-66-77. If the generator is accumulating hazardous waste(s) in containers, please complete Management of Containers checklist to document compliance with these requirements.

2. Is the generator accumulating hazardous waste(s) in tanks? N

If so, OAC 3745-52-34(A) (1) requires generators to comply with Rules 3745-66-90 to 3745-66-992 except Paragraph (c) of rule 3745-66-97 and rule 3745-66-991.

If the generator is accumulating hazardous waste(s) in tanks, complete the Storage and Treatment in Tanks checklist to document compliance with these requirements.

3. Has the generator accumulated hazardous wastes in excess of ninety (90) days? NA

a. If so, has the generator been granted an extension by the Director for accumulation in excess of (90) days? NA

REMARKS - GENERATOR ACCUMULATION REQUIREMENTS

#1 tote not marked near paint booths

SATELLITE ACCUMULATION AREA REQUIREMENTS
(OAC 3745-52-34 (C))

Y/N/NA RMK #

1. Has the facility elected to accumulate hazardous waste at or near a point of generation which is under the control of the operator of the process generating the waste? (defined as satellite accumulation)

Y _____

If so, are the following requirements of OAC 3745-52-34 (C) being met:

- a. Quantities of waste accumulated do not exceed 55 gallons at any time?
- b. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time?
- c. The generator has marked the containers with words "Hazardous Waste" or with other words identifying the contents of the container?

Y _____

NA _____

Y _____

If the facility is maintaining satellite accumulation areas as identified in 1.a. and 1.b. above, OAC 3745-52-34 (C) also requires that the container(s) in these areas be managed in compliance with the "Container Management" requirements of OAC 3745-66-71, 3745-66-72, 3745-66-73 (A), 3745-66-76 and 3745-66-77. Please complete the Use and Management of Containers checklist to document compliance with these requirements.

2. Is the facility accumulating hazardous waste(s) in excess of the amounts listed in either 1.a or 1.b?

Y ~~NA~~ _____

- a. If so, did the generator comply with 3745-52-34 (A) within three (3) days? and;

NA _____

- b Upon accumulating > 55-gallons of waste, did the generator mark the container holding the excess hazardous waste with the date the excess began accumulating?

N _____

REMARKS - SATELLITE ACCUMULATION REQUIREMENTS



State of Ohio Environmental Protection Agency

Northeast District Office

10 E. Aurora Road
Twinsburg, Ohio 44087-1969
(216) 963-1200 (216) 425-9171
FAX (216) 487-0769

George V. Voinovich
Governor

April 24, 1991

RE: EKCO HOUSEWARES
STARK COUNTY
OHD 045 205 424
RETURN TO COMPLIANCE

CERTIFIED MAIL

Mr. Thomas Shingleton
Ekco Housewares, Inc.
359 State Ave., N.W.
P.O. Box 560
Massillon, Ohio 44658

RECEIVED
OHIO EPA

APR 25 1991

Dear Mr. Shingleton:

Thank you for your letter dated April 19, 1991.

Based on the documentation provided by Jeff Richardson in your letter, it appears that your facility has returned to compliance with the applicable Ohio Hazardous Waste Regulations as cited in my March 20, 1991 notice of violation.

Please note that a detailed review of the groundwater monitoring, closure plan and financial assurance requirements was not a part of this inspection. These may be handled in separate reviews. Also, be advised that past instances of non-compliance can continue as subjects of pending or future enforcement actions since they constitute violations of the Ohio Revised Code Chapter 3734.

If you should have any questions regarding this matter, please contact me at (216) 425-9171.

Sincerely,

Karen L. Nesbit
Environmental Scientist
Division of Solid and Hazardous Waste
Management

KLN/fn

cc: Harry Courtright, DSHWM, NEDO
Laurie Stevenson, DSHWM, CO

RECEIVED
OHIO EPA

APR 25 1991

DIV. of SOLID & HAZ. WASTE MGT.

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: Ekeo Housewares, Inc.
 U.S. EPA ID No.: OH 045 205 424
 Street: 359 State Ave., N.W.
 City: Massillon State: OH Zip: 44648
 Telephone: (216) 832-5026

Inspection Date: [REDACTED] Time: 10:00 (am/pm)

Weather Conditions: sunny, cool

| | <u>Name</u> | <u>Agency/Title</u> | <u>Telephone</u> |
|---------------------------|------------------------|-----------------------|-----------------------|
| Inspectors: | <u>Karen Nesbit</u> | <u>CEPA-E. Spec 2</u> | <u>(216) 425-9171</u> |
| | <u>Janet Boyer</u> | <u>CEPA-EE2</u> | <u>(216) 425-9171</u> |
| Facility Representatives: | <u>JEFF RICHARDSON</u> | <u>EKEO</u> | <u>(216) 832-5026</u> |

See Appendix B to determine which of the following LDR waste categories the facility manages:

| | <u>Generate</u> | <u>Transport</u> | <u>Treat</u> | <u>Store</u> | <u>Dispose</u> |
|---------------------------------|-----------------|------------------|--------------|--------------|----------------|
| F001-F005 Solvents | <u>✓</u> | <u>_____</u> | <u>_____</u> | <u>_____</u> | <u>_____</u> |
| F020-F023 and F026-F028 | <u>_____</u> | <u>_____</u> | <u>_____</u> | <u>_____</u> | <u>_____</u> |
| California List* | <u>_____</u> | <u>_____</u> | <u>_____</u> | <u>_____</u> | <u>_____</u> |
| First Third [40 CFR 268.10] | <u>_____</u> | <u>_____</u> | <u>_____</u> | <u>_____</u> | <u>_____</u> |
| Second Third [40 CFR 268.11] | <u>_____</u> | <u>_____</u> | <u>_____</u> | <u>_____</u> | <u>_____</u> |
| Third Third [40 CFR 268.12] | <u>✓</u> | <u>_____</u> | <u>_____</u> | <u>_____</u> | <u>_____</u> |

* See Appendix A

INSPECTION SUMMARY

Processes That Generate LDR Wastes:

- ① Still bottom wastes F001, D040
- ② Paint Booth Sludge F003, F005, D001
- ③ Safety-Kleen parts washer - D001
- ④ Chlorinated scrap batch mixes - D001
- ⑤ Booth water - F003, F005
- ⑥ Booth floor - D001, F003, F005
- ⑦ Silicon paint waste - D001, F005

LDR Waste Management:

All LDR wastes sent to Ross Incineration

Summary:

EKO manufactures silicon coated bakeware

Signature:

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

II. WASTE IDENTIFICATION

A. List waste codes which the facility handles in each of the following LDR categories*:

1. F001 through F005 spent solvents:

F001, F003, F005

2. F020-F023 and F026-F028 dioxin-containing wastes:

3. California List Wastes (See Appendix A):

4. First Third Wastes [40 CFR 268.10]:

5. Second Third Wastes [40 CFR 268.11]:

6. Third Third Wastes [40 CFR 268.12]**:

~~D040~~ D040

*See Appendix B.

** Note: Effective 09/25/90, large quantity generators and TSDs are required to use the toxicity characteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determining the toxicity characteristic (TC). Small quantity generators must comply with this new requirement by 03/29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly identified" wastes. They will be regulated under 40 CFR Part 268 only after they are evaluated by U.S. EPA, even if they are characteristic for a constituent previously covered under the EP toxicity characteristic [55 FR 22531].

B. Waste Code Determination

1. Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?*

Yes ☒ No ☐

If no, list below:

Assigned ClassificationCorrect Classification

* Areas of concern include: California List/waste categories with more stringent treatment standards; listed/characteristic; multi-source/single-source leachate; P and U waste codes/F and K wastes; and waste code carry through principle.

Comments: _____

2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic? [40 CFR 268.9(a)]

Yes ☒ No ☐ NA ☐

Comments _____

3. Has multi-source leachate been assigned the F039 waste code?* [40 CFR 261.31]

Yes ☐ No ☐ NA ☒

*Leachate derived exclusively from F020-F023 and/or F026-F028 dioxin wastes retains the individual waste codes.

If yes, was single-source leachate combined to form multi-source leachate? [55 FR 22623]

Yes ☐ No ☐

Comments _____

C. Does the facility handle the following wastes (national capacity variances)?

1. F001-F005 contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.30(c)]

Yes ☐ No ☒ List _____

2. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.31(b)]

Yes ☐ No ☒ List _____

3. California list contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.32(d)(2)]

Yes ☐ No ☒ List _____

4. K048-K052 petroleum wastes (nonwastewaters; expires - 11/08/90). [40 CFR 268.35(b)]

Yes ☐ No ☒ List _____

5. Soil and debris contaminated with wastes that had treatment standards based on incineration set in the Second Third rule - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U190, U221, U223, U235 (expires - 06/08/91). [40 CFR 268.34(d)]

Yes ☐ No ☒ List _____

6. Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. See Appendix A; (expires - 05/08/92). [40 CFR 268.35(e)]

Yes ☐ No ☒ List _____

7. The following nonwastewaters - F039, K031, K084, K101, K102, K106, P010, P011, P012, P036, P038, P065, P087, P092, U136, U151. (expires -05/08/92). [40 CFR 268.35(c)]

Yes ☐ No ☒ List _____

8. The following wastes identified as hazardous based on a characteristic alone: D004 (nonwastewaters), D008 (lead materials stored before secondary smelting), D009 (nonwastewaters) (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ☐ No ☒ List _____

9. Inorganic solid debris [?] defined in 40 CFR 268.2(g)*; includes chromium refractory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ☐ No ☒ List _____

*Note: Incorrect reference [40 CFR 268.2(a)(7)] in Third Third rule.

10. RCRA hazardous wastes that contain naturally occurring radioactive materials (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ☐ No ☒ List _____

11. Wastes listed in 40 CFR 268.10, 268.11, and 268.12 that are mixed radioactive/hazardous wastes (expires - 05/08/92)*. [40 CFR 268.35(d)]

Yes ☐ No ☒ List _____

*Note: 40 CFR 268.10 and 268.11 wastes incorrectly omitted from this variance in the Third Third rule.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

III. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification*

*Note: This information is generally available on LDR notifications. If not, waste profile data and other documentation should be checked.

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?

Yes ☒ No ☐ NA ☐

If available, list each waste code and check the correct treatability group.

| Waste Code | Wastewater* | Nonwastewater |
|-------------|--------------------------|-------------------------------------|
| <u>F001</u> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <u>F003</u> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <u>F005</u> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

*Less than 1% by weight total organic carbon (TOC), or less than 1% by weight total F001-F005 solvent constituents listed in 40 CFR 268.41, Table CCUE. [40 CFR 268.2(f)(1)]

Comments _____

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?

Yes ☐ No ☐ NA ☒

If yes, list each waste code and check the correct treatability group.

| Waste Code | Wastewater* | Nonwastewater |
|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Comments _____

*Less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight. [40 CFR 268.2(f)]

3. First, Second, and Third Third Wastes:

- a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

Yes ☒ No ☐ NA ☐

If available, list each waste code and check the correct treatability group:

| <u>Waste Code</u> | <u>Subcategory</u> | <u>Wastewater*</u> | <u>Nonwastewater</u> |
|-------------------|--------------------|--------------------|-------------------------------------|
| <u>D040</u> | _____ | _____ | <input checked="" type="checkbox"/> |
| _____ | _____ | _____ | _____ |
| _____ | _____ | _____ | _____ |

* Less than 1% TOC by weight and less than 1% total suspended solids (TSS) with the following exceptions: K011, K013, and K014 wastewaters - less than 5% by weight TOC and less than 1% by weight TSS; K103 and K104 wastewaters - less than 4% by weight TOC and less than 1% by weight TSS. [40 CFR 268.2(f)(2) and (3)]

Comments _____

- b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9 (b)]

Yes ___ No ___ NA ___

- c. Does the generator specify alternative treatment standards for lab packs?*

Yes ___ No ___ NA ☒

*Use of the alternative treatment standards is not required. [55 FR 22629]

If yes, do lab packs only contain the following wastes? [40 CFR 268.42(c)(2)]

___ Organometallics: 40 Part 268, Appendix IV constituents
___ Organics: 40 CFR Part 268, Appendix V constituents

*Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. [55 FR 22629]

- d. Does the generator specify alternative treatment standards for F039 multi-source leachate?*

Yes ___ No ___ NA ☒

*Use of the alternative treatment standards is required. [55 FR 22619]

4. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes? [55 FR 22675]

- a. Liquid hazardous wastes containing PCBs ≥ 50 ppm

Yes ___ No ___ NA ☒

If yes, check the appropriate treatability group:

___ 50 to 500 ppm PCBs
___ ≥ 500 ppm PCBs

- b. Listed or characteristic wastes containing $\geq 1,000$ mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content

Yes ☐ No ☐ NA ☒

If yes, check the appropriate treatability group:

- ☐ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)
☐ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

- c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥ 134 mg/l nickel and/or ≥ 130 mg/l thallium

Yes ☐ No ☐ NA ☒

5. National Capacity Variance Wastes: Have all applicable California List prohibitions been identified for wastes covered under national capacity variances? (See Appendix A.)

Yes ☐ No ☐ NA ☒

If a wastestream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes ☐ No ☐ NA ☒

If California List prohibitions apply to wastestreams managed by the generator, complete the following table for each waste code, noting the date on which relevant national capacity variances expire.

| Waste Code | Cal List Applicability | Expiration Date |
|----------------------|------------------------|----------------------|
| <input type="text"/> | <input type="text"/> | <input type="text"/> |
| <input type="text"/> | <input type="text"/> | <input type="text"/> |
| <input type="text"/> | <input type="text"/> | <input type="text"/> |

Comments

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes ☐ No ☒ NA ☐

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method, and documentation of approval. [40 CFR 268.42(b)]

| Waste Code | Required Technology | Alternative Method | Approval |
|----------------------|----------------------|----------------------|----------------------|
| <input type="text"/> | <input type="text"/> | <input type="text"/> | <input type="text"/> |
| <input type="text"/> | <input type="text"/> | <input type="text"/> | <input type="text"/> |
| <input type="text"/> | <input type="text"/> | <input type="text"/> | <input type="text"/> |

Comments

7. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes ___ No ☒

If yes, did the generator select the most stringent treatment standards?
[40 CFR 268.41(b) and 268.43(b)]

Yes ___ No ___

Comments _____

B. Waste Analysis

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?* [268.7(a)]

Yes ☒ No ___

*Note: This determination may be made at the point of disposal if the waste only has a prohibition level in effect.

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes ___ No ___

Comments _____

2. Which of the following analytical methods does the generator employ?*

*Note: A "No" answer to applicable questions b. through d. does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.

- a. Knowledge of waste:

Yes ___ No ☒

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]

- b. TCLP*: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP?*** (BDAT*** = stabilization/immobilization technology)

Yes ☒ No ___ NA ___

*TCLP = Toxicity Characteristic Leaching Procedure [40 CFR Part 268, Appendix I, EPA Test Method 1311]

**See Appendix C for exceptions.

***BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

TCE waste, TCE + water waste + Silikon paint waste
analyzed 15 + 16 Aug 1990 by Walsworth Hect.

- c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis? (BDAT = destruction/removal technology)

Yes ☐ No ☒ NA ☐

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

- d. PFLT*: Was PFLT used to determine if California List constituents were contained in *liquid* hazardous waste?

Yes ☐ No ☐ NA ☒

*PFLT = Paint Filter Liquids Test [Test Method 9095, EPA Publication No. SW-846]

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under 40 CFR 262.34 (permissible in some states)?

Yes ☐ No ☒ (If No, go to 4.)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes ☐ No ☐

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? 40 CFR 268.7(a)(4)]

Yes ☐ No ☐ (If No, go to 4.)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]

- ☐ Based on a detailed chemical and physical analysis of a representative sample
☐ Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements

Has the plan been filed with the Regional Administrator (return receipt, Federal Express slip, etc. required for verification)? [40 CFR 268.7(a)(4)(ii)]

Yes ☐ No ☐

Comments _____

4. Dilution Prohibition [40 CFR 268.3]:

- a. Does the generator mix prohibited* wastes with different treatment standards?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ☐ No ☒ (If No, go to b.)

List the wastes _____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ☐ No ☐

Comments _____

- b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ☐ No ☒ (If No, go to c.)

Check appropriate category:

- ☐ Dilutes to meet treatment standards
☐ Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

- ☐ Managed in treatment systems regulated under the Clean Water Act
☐ Non-toxic* characteristic wastes
☐ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001(except high TOC nonwastewaters), D002, and D003(except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

- c. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ☐ No ☒

Comments _____

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]

Yes ___ No ___ NA ☒

C. Management

1. On-Site Management

- a. Are restricted wastes treated (other than in a RCRA exempt unit), stored for greater than 90 (small quantity generator* - 180) days, or disposed on site?

Yes ___ No ☒

(If yes, the TSD Checklist must also be completed.)

* Small quantity generator = generator of greater than or equal to 100 kg/mo. but less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely hazardous waste

Comments _____

- b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ___ No ___ NA ☒

- c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ___ No ___ NA ☒

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

2. Off-Site Management: Waste Exceeds Treatment Standards

- a. Does the generator ship any waste that exceeds treatment standards /prohibition levels (not subject to a national capacity variance) to an off-site treatment or storage facility?

Yes ☒ No ___ (If No, go to 3.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

| Waste Code | Receiving Facility |
|----------------|--------------------|
| F001 D040 | ROSS INCINERATION |
| D001 F003 F005 | " |
| F003 F005 | " |
| D001 F005 | " |
| D001 | Safety Kleen |

Does the generator provide a notification to the treatment or storage facility?
[40 CFR 268.7(a)(1)]

Yes ☒ No ☐ (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ☒ No ☐ NA ☒

b.

Is a notification sent with each waste shipment?

Yes ☒ No ☒ no notification with manifest # 00026 and # 00030 to Ross Incinerator on site

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ☐ No ☒ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

| Waste Code | Subsequent Handler |
|------------|--------------------|
| _____ | _____ |
| _____ | _____ |
| _____ | _____ |

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ☐ No ☐

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes ☐ No ☒ (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

| Waste Code | Receiving Facility |
|------------|--------------------|
| _____ | _____ |
| _____ | _____ |
| _____ | _____ |

Does the generator provide a notification and a certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ☐ No ☐ (If No, go to d.)

- b. Are a notification and a certification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to c.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code

Subsequent Handler

Did the small quantity generator provide a notification and a certification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

- c. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 4.)

Complete the following table:

Waste Code

Receiving Facility

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ___ No ___

4. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

- a. Does the generator ship wastes to a treatment, storage, or disposal facility which are subject to a national capacity variance (40 CFR Part 268, Subpart C), or case-by-case extension (40 CFR 268.5)?

Yes ___ No ☒ (If No, go to 5.)

Complete the following table:

Waste Code

Receiving Facility

Does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? [40 CFR 268.7(a)(3)]

Yes ☐ No ☐

b. Is a notification sent with each waste shipment?

Yes ☐ No ☐

If no, is the waste subject to a tolling agreement pursuant to 40 CFR 262.20(e) (small quantity generator only)?

Yes ☐ No ☐ (If No, go to 5.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

| Waste Code | Subsequent Handler |
|------------|--------------------|
| _____ | _____ |
| _____ | _____ |
| _____ | _____ |

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ☐ No ☐

5. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? [40 CFR 268.7(a)(6)]

Yes ☒ No ☒ no land ban notification for manifests # 00024 and #00030 to Ross Incinerator

Are copies of relevant tolling agreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? [40 CFR 268.9]

Yes ☐ No ☐ NA ☒

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision*?

Yes ☐ No ☐ NA ☒

*See Appendix B. Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

Comments _____

Facility: E Kco Housewares, Inc
USEPA I.D.: OHD 045 205 424 ENFB No.:
Street: 359 STATE AVE., N.W.
City: Massillon State: Ohio Zip: 44658
County: Stark Telephone: (216) 832-5026
Owner/Operator: _____
Street: _____
City: _____ State: _____ Zip: _____
Telephone: _____

Advance notice of inspection given? (yes) _____ (no) ✓
If so, how far in advance? _____

| | <u>Name</u> | <u>Agency/Title</u> | <u>Phone</u> |
|--------------------------|-----------------|-----------------------------------|----------------|
| Inspectors: | Karen Nesbit | CEPA - E Spec 2 | (216) 425-9171 |
| | Janet Boyer | OEPA - EE 2 | (216) 425-9171 |
| Facility Representative: | Jeff Richardson | EXCO / Environ. + Quality Control | (216) 832-5026 |

STATUS

Cond. Exempt SQG SQG Large Quantity Generator X
LDR Checklist Attached: (yes) / (no)

ACTIVITIES

Containers X Used oil burner
Tanks Hazardous waste fuel burner/blender
Wastepile Incineration/Thermal treatment
Landfill Land treatment
Surface Impoundment X Groundwater monitoring X

Revised: 1/7/91

FACILITY INSPECTION WASTE MANAGEMENT ACTIVITIES SUMMARY

DESCRIPTION OF WASTE

ON SITE MANAGEMENT

OFF SITE MANAGEMENT

| EPA WASTE CODE | QTY GEN PER MO. | PROCESS/ACTIVITY GENERATING WASTE | GENERATOR | | | T S D | TYPE OF ON-SITE TREATMENT (WHERE APPLICABLE) | RECYCLED | CONTAINER | IMPROPERLY TREATED | TANK | WASTE PILE | LANDFILL | DESCRIPTION OF OFF SITE MANAGEMENT |
|----------------------|----------------------------|--------------------------------------|----------------------------|-----------------------------|-----------------------------|-------------|---|----------|-----------|-----------------------|------|---------------|----------|---------------------------------------|
| | | | LESS THAN 90 DAYS | LESS THAN 180 DAYS | LESS THAN 370 DAYS | | | | | | | | | |
| F001 | 1000 P | Still bottom wastes | ✓ | | | | | | ✓ | | | | | Ross Incinerator |
| D001 F003 F005 | 7500 P | Paint booth sludge | ✓ | | | | | | ✓ | | | | | " " |
| D001 | 200 P 8000 P | chlorinated scrap batch mixes | ✓ | | | | | | ✓ | | | | | " " |
| F003 F005 | 8000 P | Paint booth water | ✓ | | | | | | ✓ | | | | | " " |
| F003 F005 D001 | 2300 P | Paint booth floor | ✓ | | | | | | ✓ | | | | | " " |
| D001 F005 | 3000 P | Silicon paint waste | ✓ | | | | | | ✓ | | | | | " " |
| D001 | 250 P | Safety-Kleen parts washer | ✓ | | | | | | ✓ | | | | | Safety-Kleen-Kent |
| F001 D040 | 700 P | From degreaser | | | | | Pump through on site air stripper | | | | | | | |

REMARKS - GENERAL INFORMATION

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling procedures:

Eko manufactures silicon coated bakeware.

They generate:

- ① still bottom wastes
- ② Paint booth sludge
- ③ chlorinated scrap batch mixes
- ④ paint booth water
- ⑤ paint booth floor
- ⑥ silicon paint waste
- ⑦ safety-kleen parts washer⁽²⁾ (petroleum naphtha)

Used oil sent for recycling. TCE and water from degreaser pumped through on site air stripper.

Hazardous waste # 1-6 sent to Ross Incinerator.

* This inspection did not include groundwater requirements.

GENERATOR CLASSIFICATION (OAC 3745-52-34)

Does the facility:

1. Generate < 100 Kg (25-30 gallons) of hazardous waste in a calendar month?

(yes) _____ (no) ✓

If so, the facility is classified as a Conditionally Exempt Small Quantity Generator, unless 3.b. applies. Please complete the Conditionally Exempt Small Quantity Generator Requirements checklist.

2. Generate between 100 and 1000 Kg of hazardous waste in a calendar month? (about 25 to under 300 gallons)

(yes) _____ (no) ✓

If so, the facility is classified as a Small Quantity Generator, unless 3.b. applies. Please stop here and complete the Small Quantity Generator Requirements checklist.

3. a. Generate > 1000 Kg (~ 300 gallons) of hazardous waste in a calendar month?

OR;

- b. Generate > 1 Kg of acutely hazardous waste in a calendar month?

(yes) ✓ (no) _____

If so, the facility is classified as a Large Quantity Generator. Please complete the Large Quantity Generator Requirements checklist.

REMARKS - GENERATOR CLASSIFICATION

OAC 3745-52 - LARGE QUANTITY GENERATOR REQUIREMENTS

WASTE EVALUATION (OAC 3745-52-11)

Y/N/NA RMK #

1. Have wastes generated at the facility been evaluated in compliance with the waste evaluation requirements of OAC rule 3745-52-11(A) (B) and (C)?

Y _____

If not, specify those waste streams which the generator has failed to adequately evaluate:

2. Are any wastes generated at the facility identified by the generator as being excluded from regulation under Rule 3745-51-04?

N _____

If so, specify those waste streams identified by the generator as being excluded under 3745-51-04:

3. Is the facility generating any wastes which are identified as recyclable materials as defined in OAC 3745-51-06?

Y _____

If so, please identify these waste streams below:

Degreaser still bottoms
TCE being reclaimed

4. Is the generator recycling any materials on-site by:
- Using or reusing the material as an ingredient in an industrial process to make a product?
 - If so, is the material being reclaimed before it is used or reused?
 - Using the material as a substitute for commercial products?
 - Returning the material to the original process from which it was generated as a substitute for a raw material feedstock?
 - If so, is the material reclaimed before returning to the original process?

N _____
NA _____
N _____
Y _____
Y _____

Please identify those materials that the generator is recycling as described in 4.a., 4.b. and/or 4.c. below:

TCE

5. Has the generator identified any waste treatment activity as being excluded from regulation because of totally enclosed treatment or via operation of an elementary neutralization unit and/or wastewater treatment unit as described in Rule 3745-65-01?

Y _____

If so, specify those waste treatment activities which the generator has identified as being excluded from regulation:

Boiler - to keep lime down

6. Are Land Disposal Restricted (LDR) wastes being generated? If so, complete the Land Disposal Restriction Checklist.

Y _____

GENERATOR IDENTIFICATION NUMBER (OAC 3745-52-12)

7. Prior to treating, storing, disposing, transporting or offering to transport hazardous waste, has the generator obtained a generator identification number from USEPA as required by 3745-52-12?

Y _____

GENERATOR ANNUAL REPORT (OAC 3745-52-41)

8. Has the generator filed annual reports to the Director on or before March 1st of each calendar year as required by 3745-52-41?

Y _____

HAZARDOUS WASTE IMPORT/EXPORT (OAC 3745-52-50 TO 3745-52-57
AND OAC 3745-52-60)

Y/N/NA RMK #

9. Does the generator import or export hazardous waste?

N _____

If so, are the wastes handled in accordance with the
requirements of 3745-52-50 through 3745-52-57 and
3745-52-60?

NA _____

REMARKS - HAZARDOUS WASTE IMPORT/EXPORT

PRE-TRANSPORT REQUIREMENTS (OAC 3745-52-30 TO 3745-52-33)

Y/N/NA RMK #

10. Does the generator meet the following pre-transport
requirements prior to offering hazardous wastes for
transport off-site:

- a. The waste material is packaged, labeled, and marked
in accordance with the applicable DOT regulations
[3745-52-30, 3745-52-31, and 3745-52-32]?
- b. Each container with a capacity of 110 gallons or less
is affixed with a completed hazardous waste label as
required by 3745-52-32?
- c. The generator meets the requirements for proper DOT
placarding or offers the appropriate DOT placards to
the initial transporter in compliance with 3745-52-33?

Y _____

Y _____

Y _____

REMARKS - PRETRANSPORT REQUIREMENTS

MANIFEST REQUIREMENTS (OAC 3745-52-20 TO 3745-52-23)

Y/N/NA RMK #

1. Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:
 - a. All hazardous wastes shipped off-site have been accompanied by a completed manifest, USEPA form 8700-22 in compliance with 3745-52-20 (A)?
 - b. The manifest contains all information required by 3745-52-20 and the minimum number of copies required by 3745-52-22?
 - c. The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20 (C) (D) (E)?
 - d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23 (A) (1) (2)?
2. Has the generator received a return copy of each completed manifest within thirty-five (35) days of the date the waste was accepted by the initial transporter?
 - a. If not, has the generator complied with the Manifest Exception reporting requirements in 3745-52-42?
3. Are signed copies of all hazardous waste manifests and any documentation required for Exception Reports retained for at least 3 years as required by 3745-52-40?

Y _____

Y _____

Y _____

N _____

Y _____

NA _____

Y _____

REMARKS - MANIFEST REQUIREMENTS

GENERATOR CLOSURE REQUIREMENTS (3745-52-34)

Y/N/NA RMK #

1. Has the generator closed any < 90-day accumulation unit(s) since date of last inspection?

N _____

If so, describe the unit(s) which the generator has closed:

2. If the generator has closed any < 90-day accumulation unit(s) as described in Question #1, was closure completed to meet the closure performance standard of 3745-66-11? [3745-52-34 (A) (1)]

NA _____

Please provide a description of the type of documentation provided by the generator to confirm that closure was completed in accordance with the closure performance standard:

REMARKS - GENERATOR CLOSURE REQUIREMENTS

PERSONNEL TRAINING (OAC 3745-65-16)

Y/N/NA RMK #

1. Does the generator provide a Personnel Training Program in compliance with 3745-65-16(A) (B) (C) including instruction in safe equipment operation and emergency procedures, and implementation of the contingency plan? [3745-52-34(A) (4)]
2. Does the generator provide Personnel Training to new employees within 6 months after the date of employment as required by 3745-65-16(B)? [3745-52-34(A) (4)]
3. Does the generator provide an annual refresher training course as required by 3745-65-16(B)? [3745-52-34(A) (4)]
4. Does the generator keep all the records required by 3745-65-16(D) (E) including; written job titles, job descriptions and documented employee training records? [3745-52-34(A) (4)]

Y _____

Y _____

Y _____

N _____

REMARKS - PERSONNEL TRAINING REQUIREMENTS

1. Does the o/o have a written Contingency Plan which contains the following? [3745-65-52 (A) (B) (C) (D) (E)]:
 - a. Actions to be taken by personnel in the event of an emergency incident?
 - b. Arrangements or agreements with local or state emergency authorities?
 - c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator?
 - d. A list of all emergency equipment including location, physical description and outline of capabilities?
 - e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52 (F)]?
2. Is the Contingency Plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste or hazardous waste constituents to air, soil or surface water? [3745-65-51 (A)]
3. Is a copy of the Contingency Plan and any plan revisions maintained on-site and has it been submitted to all local and state emergency service authorities that might be required to participate in execution of the plan? [3745-65-53 (A) (B)]
4. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54]
5. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-55]

Y _____Y _____Y _____Y _____Y _____Y _____Y _____NA _____Y _____

Y/N/NA RMK #

6. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the actions and made all of the notifications necessary under 3745-65-56(A-J)?

NA _____

REMARKS - CONTINGENCY PLAN REQUIREMENTS

PREPAREDNESS AND PREVENTION (OAC 3745-65-30 TO 3745-65-37)

Y/N/NA RMK #

1. Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31] Y _____
2. Has there been a fire, explosion or non-planned release of waste at the facility since date of last inspection? N _____
 - a. If yes, was the contingency plan implemented? [3745-65-51(B)] NA _____
3. If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A) (B) (C) (D)]
 - a. Internal alarm system? *Fire Alarm & sprinkler* Y _____
 - b. Access to telephone, radio or other device for summoning emergency assistance? Y _____
 - c. Portable fire control equipment, spill control and decontamination equipment? Y _____
 - d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers? Y _____
4. Is all required spill control and decontamination equipment, fire and communications equipment tested on a weekly basis and maintained as necessary? [3745-65-33] Y _____
 - a. Does the facility keep an equipment testing log required by 3745-65-33(B), including date and time of test, observations made, and date and nature of any repairs? N _____
5. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34] Y _____
6. If required due to the actual hazards associated with the waste, is adequate aisle space maintained to allow unobstructed movement of emergency or spill control equipment? [3745-65-35] Y _____
7. If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with possible hazards and facility layout? [3745-65-37(A)] Y _____

Y/N/NA RMK #

8. Where state and local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented?
[OAC 3745-65-37(B)]

N _____

REMARKS - PREPAREDNESS AND PREVENTION REQUIREMENTS

GENERATOR ACCUMULATION IN CONTAINERS AND TANKS
(OAC 3745-52-34)

Y/N/NA RMK #

1. If the generator elects to accumulate hazardous waste on-site in containers or tanks for 90 days or less without a permit as provided under 3745-52-34, are the following requirements met:
 - a. The containers or tanks are clearly marked with the words "Hazardous Waste"? [OAC 3745-52-34(A) (3)]
 - b. The date that accumulation began is clearly marked on each container? [OAC 3745-52-34(A) (2)]

N _____
Y _____

In addition, OAC 3745-52-34(A) (1) also requires generators accumulating hazardous waste(s) in containers < 90 days to comply with the "Container Management" Rules of OAC 3745-66-70 to 3745-66-77. If the generator is accumulating hazardous waste(s) in containers, please complete Management of Containers checklist to document compliance with these requirements.

2. Is the generator accumulating hazardous waste(s) in tanks?

N _____

If so, OAC 3745-52-34(A) (1) requires generators to comply with Rules 3745-66-90 to 3745-66-992 except Paragraph (c) of rule 3745-66-97 and rule 3745-66-991.

If the generator is accumulating hazardous waste(s) in tanks, complete the Storage and Treatment in Tanks checklist to document compliance with these requirements.

3. Has the generator accumulated hazardous wastes in excess of ninety (90) days?

N _____

- a. If so, has the generator been granted an extension by the Director for accumulation in excess of (90) days?

NA _____

REMARKS - GENERATOR ACCUMULATION REQUIREMENTS

the 5 gallon buckets need "Hazardous Waste" or the name of the

SATELLITE ACCUMULATION AREA REQUIREMENTS
(OAC 3745-52-34(C))

Y/N/NA RMK #

1. Has the facility elected to accumulate hazardous waste at or near a point of generation which is under the control of the operator of the process generating the waste? (defined as satellite accumulation)

Y _____

If so, are the following requirements of OAC 3745-52-34(C) being met:

- a. Quantities of waste accumulated do not exceed 55 gallons at any time?
b. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time?
c. The generator has marked the containers with words "Hazardous Waste" or with other words identifying the contents of the container?

Y _____

NA _____

N _____

If the facility is maintaining satellite accumulation areas as identified in 1.a. and 1.b. above, OAC 3745-52-34(C) also requires that the container(s) in these areas be managed in compliance with the "Container Management" requirements of OAC 3745-66-71, 3745-66-72, 3745-66-73(A), 3745-66-76 and 3745-66-77. Please complete the Use and Management of Containers checklist to document compliance with these requirements.

2. Is the facility accumulating hazardous waste(s) in excess of the amounts listed in either 1.a or 1.b?

N _____

- a. If so, did the generator comply with 3745-52-34(A) within three (3) days? and;

Y _____

- b. Upon accumulating > 55-gallons of waste, did the generator mark the container holding the excess hazardous waste with the date the excess began accumulating?

Y _____

REMARKS - SATELLITE ACCUMULATION REQUIREMENTS

1. Are hazardous wastes stored in containers which are:
- a. Closed? [3745-66-73(A)] N _____
 - b. In good condition? [3745-66-71] Y _____
 - c. Compatible with wastes stored in them? [3745-66-72] Y _____
2. Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)] N _____
3. Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)] Y _____
4. Is the area where containers are stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74] Y _____
5. Is the facility recording inspections described in Question #4 in an inspection log or inspection summary as required by OAC 3745-66-74(B) which contains the following information:
- a. Date and time of inspections? N _____
 - b. Name of inspector? Y _____
 - c. Notation of observations made during the inspection? N _____
 - d. The date and nature of any repairs or other remedial action? NA _____
6. Are ignitable and/or reactive hazardous waste(s) being managed at the facility? If so, Y _____
- a. Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Y _____
 - b. Are containers holding hazardous wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] NA _____

REMARKS - CONTAINER MANAGEMENT REQUIREMENTS

OAC 3745-67 SURFACE IMPOUNDMENTS

Y/N/NA RMK #

1. Is at least 2 feet (60 cm) of freeboard maintained in the surface impoundment, or has written certification that the impoundment is of adequate design been prepared? [3745-67-22]
2. Are earthen structural containment systems equipped with protective cover such as grass, shale or rock to minimize erosion from wind and water? [3745-67-23]
3. Is the level of freeboard in the surface impoundment inspected at least once each operating day? [3745-67-26(A)]
4. Is the structural containment system inspected at least once per week? [3745-67-26(B)]
5. Are the inspections noted in Question 4 and 5 documented?

NA _____

Y _____

NA _____

Y _____

Y _____

MANAGEMENT OF IGNITABLE/REACTIVE WASTE IN SURFACE IMPOUNDMENTS

Y/N/NA RMK #

6. Whenever a surface impoundment is used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the surface impoundment, has the facility insured the safety of such changes by: [3745-67-25]
 - a. Waste analyses and trial treatment? or;
 - b. Written documented information on similar treatment of similar waste under similar conditions?
7. With the exception of emergency situations, whenever ignitable or reactive wastes are placed in a surface impoundment, has the facility insured the safety of the operation by complying with the following: [3745-67-29 and 3745-65-17]
 - a. The waste is immediately treated after placement in the surface impoundment so that it is no longer hazardous?
 - b. The waste is managed to protect from ignition?
 - c. A certification from a qualified chemist or engineer is maintained at the facility stating that the design/operation of the unit will prevent ignition or reaction?
8. Is the placement of incompatible waste materials in the same surface impoundment done in compliance with the safety requirements of 3745-65-17? [3745-67-30]

NA _____

I _____

V _____

I _____

I _____

V _____

I _____

Y/N/NA RMK #

9. At closure, were all standing liquids, waste residues, liners, and contaminated soil removed from the unit?
[3745-67-28]

10. Has the owner/operator retrofitted the surface impoundment or ceased receipt of hazardous waste by November 8, 1988?

If no, did USEPA grant an exemption prior to that date?

NOTE: IF THE OPERATOR ELECTS NOT TO EXEMPT THE SURFACE IMPOUNDMENT FROM FURTHER REGULATION BY REMOVING ALL WASTE MATERIALS, THE SURFACE IMPOUNDMENT IS SUBJECT TO THE POST-CLOSURE CARE AND GROUND WATER MONITORING REQUIREMENTS SPECIFIED IN 3745-68-10 AND 3745-67-28(C).

REMARKS - SURFACE IMPOUNDMENT REQUIREMENTS

impoundment presently under closure

RCRA INTERIM STATUS INSPECTION FORM

Facility Name: EKco Housewares, Inc. Date of Inspection: 11/1/92
 Address: 359 State Ave. NW HWFB #: NA
Massillon, OH 44648 USEPA ID #: OH D 045 205 424
 County: Stark Facility Phone #: (216) 832-5026
 Facility Contact: Tom Marcovechio Facility Contact Phone #: (216) 832-5026
Tom Singleton Safety Equipment #: _____
 Inspector(s) Name(s): Taret Boyer
Ursula Schaler

STATUS

Cond. Ex. SQG ___ SQG ___ Generator ☒ Transporter ___ Treatment ___ Storage ___ Disposal ___

ACTIVITIES

Containers ☒ Tanks ___ Surface Impoundments ☒ Incineration/Thermal treatment ___
 Waste pile ___ Land treatment ___ Landfill ___ Groundwater monitoring ___
 Used oil burner ___ Hazardous waste fuel burner/blender ___

| | <u>Y/N/NA</u> | <u>REMARK #</u> |
|---|---------------|--------------------|
| 1. Does the facility produce "discarded materials" as defined in 3745-51-02(A)? | <u>Y</u> | |
| 2. Are they : | | |
| a. Abandoned(disposed;incinerated;accumulated, stored, or treated prior to disposal)? | <u>Y</u> | |
| b. Recycled? | <u>Y</u> | <u>recycle TCE</u> |
| c. Inherently waste-like?(F020,F021,F022,F023,F026,F028)? | <u>N</u> | |
| 3. If recycled or accumulated, treated or stored before recycling, is the waste: | | |
| a. Used in a manner constituting disposal? | <u>N</u> | |
| b. Burned for energy recovery? | <u>N</u> | |
| c. Reclaimed? (Refer to Table 1 of 3745-51-02) | <u>Y</u> | |
| d. Accumulated speculatively? | <u>N</u> | |
| 4. Is the material recycled by being: | | |
| a. Used or reused as an ingredient in an industrial process to make a product without prior reclamation? | <u>N</u> | |
| b. Used as an effective substitute for commercial products? | <u>N</u> | |
| c. Returned to the original process from which it was generated without prior reclamation as a substitute for a raw material feedstock? | <u>N</u> | |

Y/N/NA REMARKS

5. Are Land Disposal Restricted (LDR) wastes generated? If so, complete appropriate LDR checklist.
6. Has the facility submitted a Part A application to Ohio EPA in accordance with OAC 3745-50-40?
7. If yes, is it complete and accurate and does it contain all information specified in OAC 3745-50-41, -42, -43?
8. If not accurate, has a Permit Change Request (PCR) been submitted in accordance with 3745-50-51? If yes, what date was the PCR submitted.
9. Is the facility operating in compliance with the terms and conditions of its HWFB permit?
10. Has the facility submitted a Part B?
11. Was advance notice of the inspection given? If so, how far in advance?

Y _____

N _____

NA _____

NA _____

NA _____

N _____

N _____

REMARKS. GENERAL INFORMATION.

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling.

EKco manufactures silicon coated bake ware.

They generate:

① still bottom waste - F001, D007, D009

② paint booth sludge & water - F003, F005

③ - Safety Kleen pants washers (2) - D001 (petroleum naphtha)

Used oil is sent to recycling. - ~~other~~ ^{hazardous} waste is sent to Ross - Incineration.

* This inspection did not cover compliance with groundwater ~~and~~ or financial requirements.

OAC 3745-52 GENERATOR REQUIREMENTS (40 CFR Part 262)

Y/N/NA REMARK #

- | | | | |
|----|--|-----------|-------|
| 1. | Have the wastes generated at this facility been evaluated as required under 3745-52-11 (262.11)? | <u>Y</u> | _____ |
| 2. | Does this facility generate any hazardous wastes that are excluded from regulation under 3745-51-04 (261.4)? | <u>N</u> | _____ |
| 3. | Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment [3745-65-01] (265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit [3745-65-01] (265.1(c)(10))? | <u>N</u> | _____ |
| 4. | Is the generator classified as a Small Quantity Generator (SQG) or conditionally exempt SQG? If so, complete appropriate checklist. | <u>N</u> | _____ |
| 5. | Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest: | | |
| a. | All hazardous wastes shipped off-site have been accompanied by a completed manifest using the most recently revised USEPA form 8700-22? | <u>Y</u> | _____ |
| b. | The manifest form used contains all the information required by 3745-52-20 (262.20) and the minimum number of copies required by 3745-52-22 (262.22)? | <u>Y</u> | _____ |
| c. | The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or <u>instructions to return waste</u> in compliance with 3745-52-20(C)(D)(E) (262.20)? | <u>Y</u> | _____ |
| d. | Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23(A)(1&2) (262.23)? | <u>Y</u> | _____ |
| e. | The generator has complied with manifest exception reporting requirements in 3745-52-42 (262.42(a))? | <u>NA</u> | _____ |
| f. | Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by 3745-52-40 (262.40)? | <u>Y</u> | _____ |

Y/N/NA REMARK #

Does the generator meet the following hazardous waste pre-transport requirements:

Y _____

a. Prior to offering hazardous wastes for transport off-site, the waste material is packaged, labeled, and marked in accordance with applicable DOT regulations [3745-52-30, 3745-52-31, and 3745-52-32] (262.30, 262.31, 262.32)?

Y _____

b. Prior to offering hazardous waste for transport off-site, each container with a capacity of 110 gallons or less is affixed with a completed hazardous waste label as required by 3745-52-32 (262.32)?

Y _____

c. Prior to offering hazardous wastes for transport off-site, the generator meets requirements for properly placarding or offering to properly placard for the initial transporter of the waste material in compliance with 3745-52-33 (262.33)?

Y ROSS

7. Does the generator import or export hazardous waste?

N _____

 If so, are the wastes handled in accordance with the requirements of 3745-52-50 (262.50)?

NA _____

8. If the generator elects to accumulate hazardous waste on-site in containers or tanks for 90 days or less without a hazardous waste facility installation and operation permit as provided under 3745-52-34 (262.34), are the following requirements with respect to such accumulation met:

a. The containers or tanks are clearly marked with the words "Hazardous Waste"?

N _____

b. The date that accumulation began is clearly marked on each container?

N _____

c. If the waste is accumulated in containers, the generator is complying with OAC 3745-66-70 to 3745-66-77? Complete Management of Containers checklist.

Y _____

Y/N/NA REMARK #

- d. If the waste is accumulated in tanks, the generator is complying with OAC 3745-66-90, to 3745-66-992 except OAC 3745-66-97(C) and 3745-66-991? Complete Storage and Treatment in Tanks checklist. NA _____
- e. If the generator accumulates waste at or near the point of generation which is under the control of the operator of the process generating the waste as allowed by 3745-52-34(C) are the following requirements met:
1. Quantities of waste accumulated do not exceed 55 gallons at any time? Y _____
 2. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time? NA _____
 3. If the generator is accumulating hazardous waste in accordance with e.1 or e.2, above, has the generator marked the containers with words "Hazardous Waste" or with other words identify the contents of the container and is the generator complying with OAC 3745-66-71, 3745-66-72, 3745-66-73(A), 3745-66-76, and 3745-66-77? N _____
 4. If the generator accumulates hazardous wastes in excess of the amounts listed in either e.1 or e.2, above, did the generator comply with 3745-52-34(A) (262.34(a)) within three (3) days and mark the container holding the excess accumulation with the date the excess accumulation began accumulating? Y _____
9. Has the generator accumulated hazardous wastes in excess of ninety (90) days? N _____
10. Has the generator been granted an extension by the Director/ Regional Administrator for accumulation in excess of ninety (90) days? NA _____
11. Has the generator treated, stored, disposed of, transported or offered for transportation hazardous waste without having obtained a USEPA identification number from the Administrator as required under 3745-52-12 (262.12)? N _____

Y/N/NA REMARK #

- | | | | |
|-----|---|----------|-------------|
| 12. | Does the generator provide a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) (265.16) including instruction in safe equipment operation and emergency procedures, training new employees within 6 months and providing an annual training program refresher course? [3745-52-34(A)(4)] (262.34) | <u>N</u> | <u>1</u> |
| 13. | Does the generator keep all of the records required by 3745-65-16(D)(E) (265.16) including written job titles, job descriptions and documented employee training records? [3745-52-34(A)(4)] (262.34) | <u>Y</u> | <u> </u> |
| 14. | Has the generator filed annual reports on or before March 1st of the next calendar year as required by 3745-52-41? | <u>Y</u> | <u> </u> |
| 15. | Does the generator comply with the applicable requirements for owners or operators of hazardous waste facilities? Complete <u>"Preparedness and Prevention"</u> and <u>"Contingency Plan and Emergency Procedures"</u> checklists. | <u>N</u> | <u>2.</u> |

REMARKS, GENERATOR REQUIREMENTS

1. The person signing the manifests has not been trained. Past due for annual refresher.
2. See preparedness checklist

Y/N/NA REMARK #

1. Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by 3745-65-13(A)(1) (265.13(a))?

Y _____

2. Does o/o have a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. [3745-65-13(B)] (265.13(b))

Y _____

3. a. Would physical contact with the waste structures or equipment injure unknowing/unauthorized person or livestock entering the facility? [3745-65-14(A)(1)] (265.14(a)(1))

Y _____

b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)] (265.14(a)(2))

Y _____

IF BOTH 3A AND 3B ARE NO, MARK QUESTIONS 4 AND 5 NOT APPLICABLE.

4. Does the facility have -

a. A 24-hour surveillance system, or

Y off-hour guards

b. An artificial or natural barrier and a means to control entry at all times [3745-65-14(B)(2)(a and b)] (265.14(b)(2))

Y _____

5. Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. [3745-65-14(C)] (265.14(c))

Y _____

6. a. Has the o/o developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. [3745-65-15] (265.15)

N Did not provide during inspection (person on vacation)

Y/N/NA REMARK #

- b. Are areas subject to spills (i.e., loading and unloading areas, etc.) inspection daily when in use and according to other applicable regulations when not in use. [3745-65-16(B)(4)] (265.15(b)(4))
7. Has the o/o provided a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course? (265.16(a)(b)(c))
8. Does o/o keep all records required by 3745-65-16(D)(E) including written job titles, job descriptions and documented employee training records? (265.16(d)(e))
9. If Ignitable, Reactive or incompatible wastes are handled, does the facility meet the following requirements? [3745-65-17] (265.17)
- a. Protection from sources of ignition.
- b. Physical separation of incompatible waste materials.
- c. "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.
- d. Comingling of waste materials is done in a controlled, safe manner as prescribed by 3745-65-17(B) (265.17(b))

N Not provided at inspection

N _____

Y _____

Y _____

NA _____

Y _____

NA _____

OAC 3745-65 PREPAREDNESS AND PREVENTION (40 CFR PART 265 SUBPART C)

| | <u>Y/N/NA</u> | <u>REMARK #</u> |
|---|---------------|-----------------------|
| 1. Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31] (265.31) | <u>Y</u> | <u> </u> |
| 2. Has there been a fire, explosion or non-planned release of waste at the facility? | <u>N</u> | <u> </u> |
| a. If yes, has the contingency plan been implemented? | <u>NA</u> | <u> </u> |
| 3. If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A)(B)(C)(D)] (265.32) | | |
| a. Internal alarm system? | <u>Y</u> | <u> </u> |
| b. Access to telephone, radio or other device for summoning emergency assistance? | <u>N</u> | <u>1.</u> |
| c. Portable fire control equipment? | <u>Y</u> | <u> </u> |
| d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers? | <u>Y</u> | <u> </u> |
| 4. Is all required spill control and decontamination equipment, fire and communications equipment tested and maintained as necessary? [3745-65-33] (265.33) | <u>Y</u> | <u> </u> |
| 5. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34] (265.34) | <u>N</u> | <u>outside 1.</u> |
| 6. If required due to the actual hazards associated with the waste, is adequate aisle space to allow unobstructed movement of emergency or spill control equipment maintained? [3745-65-35] (265.35) | <u>N</u> | <u> </u> |
| 7. If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with the possible hazards and the facility layout? [3745-65-37(A)] (265.37(a)) | <u>Y</u> | <u> </u> |

- 25 -

1. No communication device is provided near the drum storage area outside.

Y/N/NA REMARK #

8. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented. [3745-65-37(B)] (265.37(b))

NA _____

3745-65 CONTINGENCY PLAN AND EMERGENCY PROCEDURES (40 CFR PART 265 SUBPART D)

Y/N/NA REMARK #

1. Does the o/o have a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes which contains the following components for the facility? [3745-65-52(A)(B)(C)(D)(E)] (265.52):

- a. Actions to be taken by personnel in the event of an emergency incident?
- b. Arrangements or agreements with local or state emergency authorities?
- c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator?
- d. A list of all emergency equipment including location, physical description and outline of capabilities?
- e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)] (265.52(f))?

Y _____
Y _____
Y _____
Y _____
Y _____

2. Is a copy of the Contingency Plan and any plan revisions maintained on-site and has it been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan? [3745-65-53(A)(B)] (265.53)

Y _____

3. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] (265.54)

Y _____

4. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-56(A-J)] (265.56)

Y _____

5. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the actions and made all of the notifications deemed necessary under 3745-65-56(A-J). (265.56(a-j))

Y _____

OAC 3745-65 MANIFEST SYSTEM/RECORDS/REPORTING (40 CFR PART 265, SUBPART E)

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

Y/N/NA REMARK #

1. Does the o/o maintain a written operating record at the facility as required by 3745-65-73(A) (265.73) which contains the following information:

- | | | | |
|----|--|-----------|---------------------------------------|
| a. | Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal? [3745-65-73(B)(1)] (265.73(b)(1)). | <u>Y</u> | <u> </u> |
| b. | Common name, EPA Hazardous Waste Identification Number and physical state (solid, liquid, gas) of the waste? | <u>Y</u> | <u> </u> |
| c. | The estimated (or actual) weight, volume or density of the waste material? | <u>Y</u> | <u> </u> |
| d. | A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745? (Part 265, Appendix I, Table 2) | <u>Y</u> | <u> </u> |
| e. | The present physical location of each hazardous waste within the facility? | <u>Y</u> | <u> </u> |
| f. | Records of incidents which require implementation of the Contingency Plan? | <u>NA</u> | <u> </u> |
| g. | FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document numbers? [3745-65-73(B)(2)] (265.73(b)(2)). | <u>NA</u> | <u> </u> |
| h. | Records of any waste analyses and trial tests required to be performed? | <u>Y</u> | <u> </u> |
| i. | Records of the inspections required under 3745-65-15 (265.15) (General Inspection Requirements)? | <u>N</u> | <u>Not Provided During Inspection</u> |
| j. | Records of any monitoring, testing, or analytical data required under other Subparts as referenced by 3745-65-73(B)(6); (265.73(b)(6))? | <u>NA</u> | <u>1</u> |

- 28 -

1. Ground water monitoring was not evaluated in this inspection

Y/N/NA REMARK #

k. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required under OAC 3745-66 (Part 265 Subpart G)?

NA

2. Has the o/o submitted an annual (biennial) Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under 3745-65-75 (265.75)?

Y

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE ONLY TO OFF-SITE TSDS.

3. Are manifests received by the facility signed and dated? Is one copy given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least 3 years? [3745-65-71(A)] (265.71)

NA

NA

a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)] (265.71(b))?

NA

b. Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) (265.72(a)) noted in writing on the manifest document.

NA

4. Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72(B) (265.72(b)) or has the o/o submitted the required information to the Director/Regional Administrator?

NA

5. If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-65-76(A) (265.76) been submitted to the Director/Regional Administrator within 15 days?

NA

OAC 3745-66 CLOSURE AND POST-CLOSURE (40 CFR PART 265, SUBPART G)

| | | <u>Y/N/NA</u> | <u>REMARK #</u> |
|----|---|---------------|-----------------|
| 1. | Is a written closure plan on file at the facility which contains the following elements: [3745-66-12] (265.112)? | <u>Y</u> | <u> </u> |
| a. | A description of how each hazardous waste management unit will be closed in accordance with 265.111. | <u>Y</u> | <u> </u> |
| b. | A description of how final closure will meet the requirements of 3745-66-11 (265.111). | <u>Y</u> | <u> </u> |
| c. | An estimate of the maximum amount of hazardous waste ever in inventory. | <u>Y</u> | <u> </u> |
| d. | A description of steps taken to remove or decontaminate facility equipment containment systems, structures, soils, and all hazardous waste residues. | <u>Y</u> | <u> </u> |
| e. | The year closure is expected to begin and a schedule for the various phases of closure. | <u>Y</u> | <u> </u> |
| f. | A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control. | <u>Y</u> | <u> </u> |
| 2. | Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which affects the closure plan? [3745-66-12(C)] (265.112(C)) | <u>NA</u> | <u> </u> |
| 3. | Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director/Regional Administrator 180 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d)) | <u>Y</u> | <u> </u> |
| 4. | Has the closure plan (and post-closure plan, if applicable) for tank, containers storage or incinerator units been submitted to the Director/Regional Administrator 45 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d)) | <u>NA</u> | <u> </u> |

Y/N/NA REMARK #

5. Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13(A)] (265.113(a))

NA _____

6. Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(B)] (265.113(b))

NA _____

7. Did the owner/operator submit to the Director/Regional Administrator, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15] (265.115)

NA _____

8. Did the owner/operator submit to the local zoning authority and the Director/Regional Administrator a survey plan in accordance with OAC 3745-66-16?

NA _____

9. What permitted units at the facility have been closed in accordance with an approved Closure Plan?

NA Closure pending

10. If closure was partial, list the regulated units which remain in use at the facility:

11. If required, has the facility prepared a written post-closure plan? [3745-66-18] (265.118)

12. Does the post-closure plan include:

- a. A description of proposed ground water monitoring?
- b. A description of planned maintenance activities?
- c. The name, address and phone number of person/office to contact during the post-closure period?

1.

1. Not reviewed during this inspection

Y/N/NA REMARK #

13. For disposal facilities, has the owner/operator submitted to local land authorities and the Director a survey plat within 60 days after certification of closure? [3745-66-19] (265.119)

NA _____

14. Has the owner of the property on which a disposal unit is located recorded on the deed that:

a. The land has been used to manage hazardous waste and the type, quantity and location of waste?

NA _____

b. Land use is restricted pursuant to 3745-66-17? [3745-66-19] (265.119)

1 _____

OAC 3745-66 USE AND MANAGEMENT OF CONTAINERS (40 CFR PART 265, SUBPART I)

| | <u>Y/N/NA</u> | <u>REMARK #</u> |
|---|---------------|-----------------|
| 1. Are hazardous wastes stored in containers which are: | | |
| a. Closed [3745-66-73(A)] (265.173)? | <u>Y</u> | <u> </u> |
| b. In good condition [3745-66-71] (265.171)? | <u>Y</u> | <u> </u> |
| c. Compatible with the wastes stored in them [3745-66-72] (265.172)? | <u>Y</u> | <u> </u> |
| 2. Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)] (265.173(a)) | <u>Y</u> | <u> </u> |
| 3. Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)] (265.173(b)) | <u>Y</u> | <u> </u> |
| 4. Is the area where containers stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74] (265.174) [documentation of inspections required under 3745-65-15 for TSDs] | <u>Y</u> | <u> </u> |
| 5. Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] (265.176) | <u>Y</u> | <u> </u> |
| 6. Are containers holding hazardous wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] (265.177(c)) | <u>Y</u> | <u> </u> |

Y/N/NA REMARK

1. Is at least 2 feet (60 cm) of freeboard maintained in the surface impoundment, or has written certification that the impoundment is of adequate design been prepared? [3745-67-22] (265.222) Y
2. Are earthen structural containment systems equipped with protective cover such as grass, shale or rock to minimize erosion from wind and water. [3745-67-23] (265.223) Y
3. Is the level of freeboard in the surface impoundment inspected at least once each operating day, the structural containment system is inspected at least once per week and all such inspections are documented. [3745-67-26] (265.226) Y
4. Whenever a surface impoundment is used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the surface impoundment, has the facility insured the safety of such changes by: [3745-67-25] (265.225)
 - a. Waste analyses and trial treatment or NA
 - b. Written documented information on similar treatment of similar waste under similar conditions? NA
5. With the exception of emergency situations, whenever ignitable or reactive wastes are placed in a surface impoundment has the facility insured the safety of the operation by complying with the following: [3745-67-29 and 3745-65-17] (265.229 and 265.17(b)) NA
 - a. The waste is immediately treated after placement in the surface impoundment so that it is no longer hazardous? NA
 - b. The waste is managed to protect from ignition? NA
 - c. A certification from a qualified chemist or engineer is maintained at the facility stating that the design/operation of the unit will prevent ignition or reaction? NA

6. Incompatible materials are not placed in the same surface impoundment unless it is done in compliance with the safety requirements of 3745-65-17 (165.17(b)? [3745-67-30] (265.230)
7. At closure, were all standing liquids, waste residues, liners, and contaminated soil removed from the unit? [3745-67-28](265.228)
8. Has the owner/operator retrofitted the surface impoundment or ceased receipt of hazardous waste by November 8, 1988? If no, did USEPA grant an exemption prior to that date?

NANANA Closure

NOTE: IF THE OPERATOR ELECTS NOT TO EXEMPT THE SURFACE IMPOUNDMENT FROM FURTHER REGULATION BY REMOVING ALL WASTE MATERIALS, THE SURFACE IMPOUNDMENT IS SUBJECT TO THE POST-CLOSURE CARE AND GROUND WATER MONITORING REQUIREMENTS SPECIFIED IN 3745-68-10 AND 3745-67-28(C).

Facility: Eko Housewares Inc.

U.S. EPA I.D. No. : OH 045 205 424

Street: 359 State Ave. NW

City: Massillon State: OHIO Zip: 44648

Telephone: (216) 832-5026

Owner/Operator:

Street: SAME

City: _____ State: _____ Zip: _____

Telephone: _____

Inspection Date: 6/5/90 Time: 10:00-3:00

Weather Conditions: _____

| | <u>Name</u> | <u>Agency/Title</u> | <u>Telephone</u> |
|--------------------------|------------------------|---------------------|-----------------------|
| Inspectors: | <u>Tanet Boyer</u> | <u>OEPA/EE2</u> | <u>(216) 425-9171</u> |
| | <u>Ursula Schaler</u> | <u>OEPA/EE2</u> | <u>"</u> |
| Facility Representative: | <u>Tom Marcovechio</u> | <u>EKO</u> | <u>(216) 832-5026</u> |
| | <u>Tom Shingleton</u> | <u>-</u> | <u>"</u> |

| | <u>Generate</u> | <u>Transport</u> | <u>Treat</u> | <u>Store</u> | <u>Dispose</u> |
|-----------------|-----------------|------------------|--------------|--------------|----------------|
| F-Solvent | <u>✓</u> | <u>_____</u> | <u>_____</u> | <u>_____</u> | <u>_____</u> |
| Dioxin | <u>_____</u> | <u>_____</u> | <u>_____</u> | <u>_____</u> | <u>_____</u> |
| California List | <u>_____</u> | <u>_____</u> | <u>_____</u> | <u>_____</u> | <u>_____</u> |
| First Third | <u>_____</u> | <u>_____</u> | <u>_____</u> | <u>_____</u> | <u>_____</u> |
| Second Third | <u>_____</u> | <u>_____</u> | <u>_____</u> | <u>_____</u> | <u>_____</u> |

INSPECTION SUMMARY

Processes That Generate LDR Wastes

still bottom - Foo1
paint booth sludge + wastewater

- Foo3, Foo5

LDR Waste Management

All LDR wastes sent to Ross incineration

Summary

Eko manufactures silicon coated bakeware

RCRA LAND DISPOSAL RESTRICTION INSPECTION

WASTE IDENTIFICATION

1. Does the facility handle the following wastes?

a. F001 through F005 spent solvents

Yes ☒ No ☐ List* F001, F003, F005

b. Dioxin-containing Wastes

Yes ☐ No ☒ List* _____

c. California List Wastes

Yes ☐ No ☒ List* _____

d. First and Second Third Wastes

Yes ☐ No ☒ List* _____

* List wastes if room allows or attach Appendix A.

Note: Please be aware of potential misclassification of wastes (i.e., California list/"soft hammer"/characteristic waste applicabilities).

2. Does the facility handle the following wastes (national capacity variances)?

a. F001 - F005 contaminated soil or debris resulting from a CERCLA response action or RCRA corrective action (effective date — 11/08/90).

Yes ☐ No ☒ Comments _____

b. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).

Yes ☐ No ☒ Comments _____

c. California list contaminated soil or debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).

Yes ☐ No ☒ Comments _____

- d. First Third wastes with the following waste codes: K048, K049, K050, K051, K052, or K071 (effective date - 08/08/90).

Yes ☐ No ☒ Comments _____

- e. First Third contaminated soil and debris which have a treatment standard based on incineration - K016, K018, K019, K020, K022, K024, K030, K037, K048-K052, K086, K087, K101, K102, K103, and K104 (effective date - 08/08/90).

Yes ☐ No ☒ Comments _____

- f. Second Third contaminated soil and debris which have a treatment standard based on incineration - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U109, U221, U223, U235 (effective date - 06/08/91).

Yes ☐ No ☒ Comments _____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

Yes ☒ No ☐ NA ☐

If yes, check the appropriate treatability group.

☐ Wastewaters containing solvents (less than or equal to 1% total organic carbon (TOC) by weight)
☒ All other spent solvent wastes

2. First and Second Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

Yes ☐ No ☐ NA ☒

If yes, list the waste code and check the correct treatability group.

| Waste Code | Wastewater* | Non-wastewater |
|------------|-------------|----------------|
| _____ | _____ | _____ |
| _____ | _____ | _____ |
| _____ | _____ | _____ |

* Less than 1% TOC by weight and less than 1% filterable solids.

3. California List Wastes: Has the generator correctly identified the required treatment technology [268.42]?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

Yes ☐ No ☐ NA ☒

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated [40 CFR 761.70] or disposed of by other approved alternate methods [40 CFR 761.60(e)]?

Yes ☐ No ☐ NA ☒

If an alternative method is used, specify the method and state whether the facility has received approval from the Regional Administrator or Director, Exposure Evaluation Division, for an exemption from the incineration requirement:

- c. For hazardous waste that contains halogenated organic compounds (HOCs) in total concentrations greater than or equal to 1,000 mg/L or 1,000 mg/Kg (except dilute HOC wastewater), is the waste incinerated in accordance with existing requirements of 40 CFR Part 264 Subpart O or 40 CFR Part 265 Subpart O?

Yes ☐ No ☐ NA ☒

4. Does the generator mix restricted wastes with different treatment standards?

Yes ☐ No ☒ Comments _____

If yes, did the generator select the most stringent treatment standards (268.41(b), 268.43(b))?

Yes ☐ No ☐ Comments _____

B. Waste Analysis

1. Does the generator determine whether the restricted waste exceeds treatment standards or prohibition levels at the point of generation by:

- Knowledge of waste Yes ☐ No ☒

List the wastes for which "applied knowledge" was used and describe the basis of the applied knowledge determination.

Was all supporting data retained on-site, [268.7(a)(5)]?

Yes ☒ No ☐

- TCLP Yes ☐ No ☐ NA ☒

List the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- Total constituent analysis Yes ☒ No ☐ NA ☐

List the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

annual - Wadsworth/Alert Laboratories 1989
~~Wadsworth/Alert Laboratories 1989~~

- pH \leq 2 Yes ☐ No ☐ NA ☒

List the wastes for which pH testing was used.

- Paint Filter Liquid Test Yes ☐ No ☐ NA ☒

List the wastes for which PFLT was used.

2.. Does the facility dilute the restricted waste as a substitute for adequate treatment [268.3]?

Yes ☐ No ☐ NA ☒

C. Management

1. On-Site Management

Is restricted waste treated, stored for greater than 90 days, or disposed on-site?

Yes ☐ No ☒ Comments _____

If yes, the TSD Checklist must be completed.

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

Yes ☒ No ☐ (If no, go to b)

If yes, identify waste code and off-site treatment or storage facilities:

| Waste Code | Facilities | Treat/Store |
|------------------|--------------|--------------|
| P001, P003, P005 | Ross | Incineration |
| 3/3 D001 | Safety-Kleen | Recycling |
| | | |

- Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

Yes ☒ No ☐

- Does notification contain the following?

EPA Hazardous waste number(s) Yes ☒ No ☐

Applicable treatment standards and prohibition levels Yes ☒ No ☐

Manifest number Yes ☒ No ☐

Waste analysis data, if available Yes ☒ No ☐

- b. Does the facility ship any waste that meets the treatment standards to an off-site disposal facility?

Yes ☐ No ☒ (If no, go to c)

If yes, identify waste code and off-site disposal facilities:

| Waste Code | Facility |
|------------|----------|
| | |
| | |
| | |

- Does the facility provide notification and certification to the disposal facility [268.7(a)(2)]?

Yes ☐ No ☐

- Does notification contain the following?

EPA Hazardous waste number(s) Yes ☐ No ☐

Applicable treatment standards and prohibition levels Yes ☐ No ☐

Manifest number Yes ☐ No ☐

Waste analysis data, if available Yes ☐ No ☐

Certification that the waste meets treatment standards [wording in 268.7(a)(2)(ii)] Yes ☐ No ☐

- c. Is the waste subject to a nationwide variance, case-by-case extension (268.5), or no migration petition (268.6).

Yes ☐ No ☒ (If no, go to d)

- If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

Yes ☐ No ☐

- Does the notification contain the following information?

EPA hazardous waste number Yes ☐ No ☐

The corresponding treatment standards and all applicable prohibitions Yes ☐ No ☐

Manifest number Yes ☐ No ☐

Waste analysis data, if available Yes ☐ No ☐

Date the waste is subject to the prohibitions Yes ☐ No ☐

- d. Does the facility generate any First or Second Third "soft hammer" waste?

Yes ☐ No ☒ (If no, go to 4)

- Does the generator provide the following notification to the receiving facility with each shipment of waste [268.7(a)(4)]?

| | | | | | |
|-------|--|-----|-----|----|-----|
| (i) | EPA hazardous waste number | Yes | ___ | No | ___ |
| (ii) | Applicable prohibition [268.33(f), 268.34(h)] | Yes | ___ | No | ___ |
| (iii) | Manifest number | Yes | ___ | No | ___ |
| (iv) | Waste analysis data, if available | Yes | ___ | No | ___ |

3. "Soft Hammer" Demonstrations/Certifications

- a. Are any "soft hammer" wastes or treatment residues destined for ultimate disposal in a landfill or surface impoundment?

Yes ___ No ☒

- b. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

Yes ___ No ___

- c. Has the generator submitted a demonstration and certification to the Regional Administrator to document its efforts to locate practically available treatment [268.8(a)(2)]?

Yes ___ No ___

- If yes, did the generator submit the documentation and certification prior to first shipment?

Yes ___ No ___

- d. Does the demonstration contain the following information?

A list of facilities and facility officials contacted? Yes ___ No ___

Addresses Yes ___ No ___

Telephone numbers Yes ___ No ___

Contact dates Yes ___ No ___

Certification statement Yes ___ No ___

Attach a copy of the demonstration and certification.

- e. If there is no practically available treatment, has the generator included with the demonstration, a written discussion of why the generator was not able to obtain treatment or recovery for that waste [268.8(a)(2)(i)]?

Yes _____ No _____ NA ☒

If yes, attach a copy of written discussion.

- f. Does the generator ship its "soft hammer" waste off-site for treatment?

Yes No

Describe the type of treatment and treatment facilities:

| <u>Waste Code</u> | <u>Type of Treatment</u> | <u>Treatment Facility</u> |
|-------------------|--------------------------|---------------------------|
| | | |
| | | |
| | | |

- g. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

Yes _____ No _____

- h. Does the generator provide certification with each subsequent shipment of wastes to receiving facilities?

Yes _____ No _____ NA _____

4. Records Retention

Does the facility retain on-site copies of all notifications, demonstrations, and certifications for a period of 5 years [268.7(a)(6)]?

Yes ☒ No ☐ Comments _____

D. RCRA Corrective Action and CERCLA Response Action Waste

1. Has the facility disposed of contaminated soil and debris from a RCRA corrective action or a CERCLA response action in a landfill or surface impoundment?

Yes ☐ No ☒ Comments _____

2. Did the unit meet the minimum technology requirements (double liner, leachate collection system, and ground-water monitoring)?

Yes ☐ No ☐ NA ☒ Comments _____

E. Treatment Using RCRA 264/265 Exempt Units or Processes

1. Is waste treated in RCRA 264/265 exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes ☒ No ☐

List types of waste treatment units and processes:

| <u>Waste Code</u> | <u>Type of Treatment</u> | <u>Treatment Units and Processes</u> |
|-------------------|--------------------------|--------------------------------------|
| <u>F001</u> | <u>Distillation</u> | |
| | | |
| | | |

2. Are treatment residuals generated from these units?

Yes ☒ No ☐ Comments Still bottoms disposed of as F001

If yes, the residues are subject to the LDR generator requirements.

3. Are these residuals further treated, stored for greater than 90 days, or disposed on-site?

Yes ☐ No ☒ NA ☐ Comments _____

If yes, the TSD checklist must be completed.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: ERCO Housewares Inc.

U.S. EPA I.D. No.: OHIO 045-205-424

Street: 359 State Ave., N.W.

City: Massillon State: OHIO Zip Code: 44648

Telephone: (216) 832-5026

Operator: Same as above

Street: _____

City: _____ State: _____ Zip Code: _____

Telephone: _____

Owner: Centronics, Inc.

Street: _____

City: Nashua State: N. H. Zip Code: _____

Telephone: _____

Inspection Date: 2-23-88 Time: 9:30 Weather Conditions: Cloudy, Snowy

| | <u>Name</u> | <u>Affiliation</u> | <u>Telephone</u> |
|-------------|------------------------|--------------------|-----------------------|
| Inspectors: | <u>Susan McCauslin</u> | <u>CEPA</u> | <u>(216) 425-9171</u> |

Facility Representatives: Tom Marozichio

| | <u>RCRA Status</u> | <u>F-Solvent</u> | <u>LDR Status</u> <u>California List</u> | <u>First Third</u> |
|-------------|--------------------|------------------|---|--------------------|
| Generator | <u>✓</u> | <u>✓</u> | _____ | _____ |
| Transporter | _____ | _____ | _____ | _____ |
| Treater | _____ | _____ | _____ | _____ |
| Storer | _____ | _____ | _____ | _____ |
| Disposer | _____ | _____ | _____ | _____ |

RCRA LAND DISPOSAL RESTRICTION INSPECTION APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

| | | Gen. | Treat | Store | Disp. | Trans. |
|----|-------------------------|---------------|---------------|---------------|---------------|---------------|
| A. | <u>F-Solvent Wastes</u> | | | | | |
| 1. | F001 | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> | <u> </u> |
| 2. | F002 | <u> </u> | <u> </u> | <u> </u> | <u> </u> | <u> </u> |
| 3. | F003 | <u> </u> | <u> </u> | <u> </u> | <u> </u> | <u> </u> |
| 4. | F004 | <u> </u> | <u> </u> | <u> </u> | <u> </u> | <u> </u> |
| 5. | F005 | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> | <u> </u> |

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

| | | Gen. | Treat | Store | Disp. | Trans. |
|-------------|----------|---------------|---------------|---------------|---------------|---------------|
| Arsenic | 500 mg/L | <u> </u> | <u> </u> | <u> </u> | <u> </u> | <u> </u> |
| Cadmium | 100 mg/L | <u> </u> | <u> </u> | <u> </u> | <u> </u> | <u> </u> |
| Chromium VI | 500 mg/L | <u> </u> | <u> </u> | <u> </u> | <u> </u> | <u> </u> |
| Lead | 500 mg/L | <u> </u> | <u> </u> | <u> </u> | <u> </u> | <u> </u> |
| Mercury | 20 mg/L | <u> </u> | <u> </u> | <u> </u> | <u> </u> | <u> </u> |
| Nickel | 134 mg/L | <u> </u> | <u> </u> | <u> </u> | <u> </u> | <u> </u> |
| Selenium | 100 mg/L | <u> </u> | <u> </u> | <u> </u> | <u> </u> | <u> </u> |
| Thallium | 130 mg/L | <u> </u> | <u> </u> | <u> </u> | <u> </u> | <u> </u> |

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

| Gen. | Treat | Store | Disp. | Trans. |
|-------|-------|-------|-------|--------|
| _____ | _____ | _____ | _____ | _____ |

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

| | | | | |
|-------|-------|-------|-------|-------|
| _____ | _____ | _____ | _____ | _____ |
|-------|-------|-------|-------|-------|

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

| | | | | |
|--------------|-------|-------|-------|-------|
| 50 ppm _____ | _____ | _____ | _____ | _____ |
|--------------|-------|-------|-------|-------|

| | | | | |
|---------------|-------|-------|-------|-------|
| 500 ppm _____ | _____ | _____ | _____ | _____ |
|---------------|-------|-------|-------|-------|

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

_____ Yes _____ No _____ NA

If yes, state reasons for mixing:

5. Hazardous waste that contains HOCs greater than or equal to 1,000 mg/L (liquids) or 1,000 mg/kg (solids)

| | | | | |
|-------|-------|-------|-------|-------|
| _____ | _____ | _____ | _____ | _____ |
|-------|-------|-------|-------|-------|

Note (1): The prohibitions of 268.32(a)(3) and (e) do not apply if the waste is also subject to the solvent restrictions of 268 Subpart C for a specific HOC.

Note (2): The effective date of regulation for liquid wastes with HOCs greater than or equal to 1,000 mg/L and less than 10,000 mg/L was July 8, 1987; the effective date for liquid wastes containing HOCs greater than or equal to 10,000 mg/L and solid wastes containing HOCs greater than 1,000 mg/kg is November 8, 1988.

C. First Third Wastes

- Note: (1) The detailed description for waste codes are listed in Appendix C.
 (2) EPA has promulgated the treatment standards for the following waste code with .

| | Gen. | Treat | Store | Disp. | Trans. |
|-------|-------|-------|-------|-------|--------|
| F006° | _____ | _____ | _____ | _____ | _____ |
| F007 | _____ | _____ | _____ | _____ | _____ |
| F008 | _____ | _____ | _____ | _____ | _____ |
| F009 | _____ | _____ | _____ | _____ | _____ |
| F019 | _____ | _____ | _____ | _____ | _____ |
| K001° | _____ | _____ | _____ | _____ | _____ |
| K004° | _____ | _____ | _____ | _____ | _____ |
| K008° | _____ | _____ | _____ | _____ | _____ |
| K011 | _____ | _____ | _____ | _____ | _____ |
| K013 | _____ | _____ | _____ | _____ | _____ |
| K014 | _____ | _____ | _____ | _____ | _____ |
| K015° | _____ | _____ | _____ | _____ | _____ |
| K016° | _____ | _____ | _____ | _____ | _____ |
| K017 | _____ | _____ | _____ | _____ | _____ |
| K018° | _____ | _____ | _____ | _____ | _____ |
| K019° | _____ | _____ | _____ | _____ | _____ |
| K020° | _____ | _____ | _____ | _____ | _____ |
| K021° | _____ | _____ | _____ | _____ | _____ |
| K022° | _____ | _____ | _____ | _____ | _____ |
| K024° | _____ | _____ | _____ | _____ | _____ |
| K025° | _____ | _____ | _____ | _____ | _____ |
| K030° | _____ | _____ | _____ | _____ | _____ |
| K031 | _____ | _____ | _____ | _____ | _____ |
| K035 | _____ | _____ | _____ | _____ | _____ |
| K036° | _____ | _____ | _____ | _____ | _____ |
| K037° | _____ | _____ | _____ | _____ | _____ |
| K044° | _____ | _____ | _____ | _____ | _____ |
| K045° | _____ | _____ | _____ | _____ | _____ |
| K046° | _____ | _____ | _____ | _____ | _____ |

| | Gen. | Treat | Store | Disp. | Trans. |
|-------|-------|-------|-------|-------|--------|
| K047° | _____ | _____ | _____ | _____ | _____ |
| K048° | _____ | _____ | _____ | _____ | _____ |
| K049° | _____ | _____ | _____ | _____ | _____ |
| K050° | _____ | _____ | _____ | _____ | _____ |
| K051° | _____ | _____ | _____ | _____ | _____ |
| K052° | _____ | _____ | _____ | _____ | _____ |
| K060° | _____ | _____ | _____ | _____ | _____ |
| K061° | _____ | _____ | _____ | _____ | _____ |
| K062° | _____ | _____ | _____ | _____ | _____ |
| K069° | _____ | _____ | _____ | _____ | _____ |
| K071° | _____ | _____ | _____ | _____ | _____ |
| K073° | _____ | _____ | _____ | _____ | _____ |
| K083° | _____ | _____ | _____ | _____ | _____ |
| K084 | _____ | _____ | _____ | _____ | _____ |
| K085 | _____ | _____ | _____ | _____ | _____ |
| K086° | _____ | _____ | _____ | _____ | _____ |
| K087° | _____ | _____ | _____ | _____ | _____ |
| K099° | _____ | _____ | _____ | _____ | _____ |
| K100° | _____ | _____ | _____ | _____ | _____ |
| K101° | _____ | _____ | _____ | _____ | _____ |
| K102° | _____ | _____ | _____ | _____ | _____ |
| K103° | _____ | _____ | _____ | _____ | _____ |
| K104° | _____ | _____ | _____ | _____ | _____ |
| K106° | _____ | _____ | _____ | _____ | _____ |
| P001 | _____ | _____ | _____ | _____ | _____ |
| P004 | _____ | _____ | _____ | _____ | _____ |
| P005 | _____ | _____ | _____ | _____ | _____ |
| P010 | _____ | _____ | _____ | _____ | _____ |
| P011 | _____ | _____ | _____ | _____ | _____ |
| P012 | _____ | _____ | _____ | _____ | _____ |
| P015 | _____ | _____ | _____ | _____ | _____ |
| P016 | _____ | _____ | _____ | _____ | _____ |
| P018 | _____ | _____ | _____ | _____ | _____ |

| | Gen. | Treat | Store | Disp. | Trans. |
|------|-------|-------|-------|-------|--------|
| P020 | _____ | _____ | _____ | _____ | _____ |
| P030 | _____ | _____ | _____ | _____ | _____ |
| P036 | _____ | _____ | _____ | _____ | _____ |
| P037 | _____ | _____ | _____ | _____ | _____ |
| P039 | _____ | _____ | _____ | _____ | _____ |
| P041 | _____ | _____ | _____ | _____ | _____ |
| P048 | _____ | _____ | _____ | _____ | _____ |
| P050 | _____ | _____ | _____ | _____ | _____ |
| P058 | _____ | _____ | _____ | _____ | _____ |
| P059 | _____ | _____ | _____ | _____ | _____ |
| P063 | _____ | _____ | _____ | _____ | _____ |
| P068 | _____ | _____ | _____ | _____ | _____ |
| P069 | _____ | _____ | _____ | _____ | _____ |
| P070 | _____ | _____ | _____ | _____ | _____ |
| P071 | _____ | _____ | _____ | _____ | _____ |
| P081 | _____ | _____ | _____ | _____ | _____ |
| P082 | _____ | _____ | _____ | _____ | _____ |
| P084 | _____ | _____ | _____ | _____ | _____ |
| P087 | _____ | _____ | _____ | _____ | _____ |
| P089 | _____ | _____ | _____ | _____ | _____ |
| P092 | _____ | _____ | _____ | _____ | _____ |
| P094 | _____ | _____ | _____ | _____ | _____ |
| P097 | _____ | _____ | _____ | _____ | _____ |
| P102 | _____ | _____ | _____ | _____ | _____ |
| P105 | _____ | _____ | _____ | _____ | _____ |
| P108 | _____ | _____ | _____ | _____ | _____ |
| P110 | _____ | _____ | _____ | _____ | _____ |
| P115 | _____ | _____ | _____ | _____ | _____ |
| P120 | _____ | _____ | _____ | _____ | _____ |
| P122 | _____ | _____ | _____ | _____ | _____ |
| P123 | _____ | _____ | _____ | _____ | _____ |
| U007 | _____ | _____ | _____ | _____ | _____ |
| U009 | _____ | _____ | _____ | _____ | _____ |

| | Gen. | Treat | Store | Disp. | Trans. |
|------|-------|-------|-------|-------|--------|
| U010 | _____ | _____ | _____ | _____ | _____ |
| U012 | _____ | _____ | _____ | _____ | _____ |
| U016 | _____ | _____ | _____ | _____ | _____ |
| U018 | _____ | _____ | _____ | _____ | _____ |
| U019 | _____ | _____ | _____ | _____ | _____ |
| U022 | _____ | _____ | _____ | _____ | _____ |
| U029 | _____ | _____ | _____ | _____ | _____ |
| U031 | _____ | _____ | _____ | _____ | _____ |
| U036 | _____ | _____ | _____ | _____ | _____ |
| U037 | _____ | _____ | _____ | _____ | _____ |
| U041 | _____ | _____ | _____ | _____ | _____ |
| U043 | _____ | _____ | _____ | _____ | _____ |
| U044 | _____ | _____ | _____ | _____ | _____ |
| U046 | _____ | _____ | _____ | _____ | _____ |
| U050 | _____ | _____ | _____ | _____ | _____ |
| U051 | _____ | _____ | _____ | _____ | _____ |
| U053 | _____ | _____ | _____ | _____ | _____ |
| U061 | _____ | _____ | _____ | _____ | _____ |
| U063 | _____ | _____ | _____ | _____ | _____ |
| U064 | _____ | _____ | _____ | _____ | _____ |
| U066 | _____ | _____ | _____ | _____ | _____ |
| U067 | _____ | _____ | _____ | _____ | _____ |
| U074 | _____ | _____ | _____ | _____ | _____ |
| U077 | _____ | _____ | _____ | _____ | _____ |
| U078 | _____ | _____ | _____ | _____ | _____ |
| U086 | _____ | _____ | _____ | _____ | _____ |
| U089 | _____ | _____ | _____ | _____ | _____ |
| U103 | _____ | _____ | _____ | _____ | _____ |
| U105 | _____ | _____ | _____ | _____ | _____ |
| U108 | _____ | _____ | _____ | _____ | _____ |
| U115 | _____ | _____ | _____ | _____ | _____ |
| U122 | _____ | _____ | _____ | _____ | _____ |
| U124 | _____ | _____ | _____ | _____ | _____ |

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes ☐ No ☐ NA

If yes, check the appropriate treatability group.

- ☐ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
☐ Pharmaceutical wastewater containing spent methylene chloride
☒ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

☐ Yes ☐ No ☐ NA

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

☐ Yes ☐ No ☐ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

3. First Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☐ Yes ☐ No ☐ NA

If yes, check the appropriate treatability group.

☐ Wastewater (less than 1% TOC by weight and less than 1% filterable solids)
☐ Nonwastewaters

List the waste code and check the correct treatment standard group.

| Waste Code | Wastewater | Nonwastewater |
|------------|------------|---------------|
| _____ | _____ | _____ |
| _____ | _____ | _____ |
| _____ | _____ | _____ |
| _____ | _____ | _____ |

B. Waste Analysis

1. F-Solvent Wastes

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

☒ Yes ☐ No ☐ NA

How was this determination made?

- Knowledge of waste

☒ Yes ☐ No

If yes, is any supporting data available for review? Describe how this is adequate. _____

- TCLP

☐ Yes ☒ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

| | Gen. | Treat | Store | Disp. | Trans. |
|------|-------|-------|-------|-------|--------|
| U129 | _____ | _____ | _____ | _____ | _____ |
| U130 | _____ | _____ | _____ | _____ | _____ |
| U133 | _____ | _____ | _____ | _____ | _____ |
| U134 | _____ | _____ | _____ | _____ | _____ |
| U137 | _____ | _____ | _____ | _____ | _____ |
| U151 | _____ | _____ | _____ | _____ | _____ |
| U154 | _____ | _____ | _____ | _____ | _____ |
| U155 | _____ | _____ | _____ | _____ | _____ |
| U157 | _____ | _____ | _____ | _____ | _____ |
| U158 | _____ | _____ | _____ | _____ | _____ |
| U159 | _____ | _____ | _____ | _____ | _____ |
| U171 | _____ | _____ | _____ | _____ | _____ |
| U177 | _____ | _____ | _____ | _____ | _____ |
| U180 | _____ | _____ | _____ | _____ | _____ |
| U185 | _____ | _____ | _____ | _____ | _____ |
| U188 | _____ | _____ | _____ | _____ | _____ |
| U192 | _____ | _____ | _____ | _____ | _____ |
| U200 | _____ | _____ | _____ | _____ | _____ |
| U209 | _____ | _____ | _____ | _____ | _____ |
| U210 | _____ | _____ | _____ | _____ | _____ |
| U211 | _____ | _____ | _____ | _____ | _____ |
| U219 | _____ | _____ | _____ | _____ | _____ |
| U220 | _____ | _____ | _____ | _____ | _____ |
| U221 | _____ | _____ | _____ | _____ | _____ |
| U223 | _____ | _____ | _____ | _____ | _____ |
| U226 | _____ | _____ | _____ | _____ | _____ |
| U227 | _____ | _____ | _____ | _____ | _____ |
| U228 | _____ | _____ | _____ | _____ | _____ |
| U237 | _____ | _____ | _____ | _____ | _____ |
| U238 | _____ | _____ | _____ | _____ | _____ |
| U248 | _____ | _____ | _____ | _____ | _____ |
| U249 | _____ | _____ | _____ | _____ | _____ |

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☒ Yes ☐ No ☐ NA

If yes, specify the waste stream:

F001, F005

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

☐ Yes ☒ No ☐ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

Waste stream does not change

2. California List Wastes

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

☐ Yes ☐ No ☐ NA

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

☐ Yes ☐ No ☐ NA

What type of absorbent is used? _____

Check the types of waste to which absorbent is added.

☐ Liquid hazardous waste having a pH less than or equal to 2

☐ Liquid hazardous waste containing metals

☐ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

☐ Yes ☐ No ☐ NA

If yes, is any supporting data available for review? Describe how this is adequate. _____

- Testing

_____ Yes _____ No _____ NA

If yes, list test method used: _____

- d. Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?

_____ Yes _____ No _____ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

- e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No _____ NA

3. First Third Wastes:

- a. Does the generator correctly determine the appropriate treatment standard of the waste?

_____ Yes _____ No _____ NA

Note: The treatment standards for first third wastes are given in Appendix D.

- b. Does the generator determine whether the First Third waste exceeds treatment standards upon generation?

_____ Yes _____ No _____ Soft hammer

If yes, specify the waste stream: _____

How was this determination made?

- Knowledge of waste

_____ Yes _____ No

If yes, is any supporting data available for review? Describe how this is adequate. _____

- TCLP

☐ Yes ☐ No ☐ NA

- Total Constituent Analysis

☐ Yes ☐ No ☐ NA

Provide the date of last test, the frequency of testing, and note any problems. Attach test results.

c. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

☐ Yes ☐ No ☐ NA

d. How does the generator test the waste when a process or waste stream changes?

C. Management

1. On-Site Management

Is restrict waste or waste that exceeds the treatment standards treated, stored, or disposed on-site?

☐ Yes ☒ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

☒ Yes ☐ No

b. Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

☒ Yes ☐ No

c. Does notification contain the following?

| | | |
|-----------------------------------|---|-----------------------------|
| EPA Hazardous waste number(s) | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| Applicable treatment standards | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| Manifest number | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| Waste analysis data, if available | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |

Identify off-site treatment or storage facilities: Ross Incineration,
Grafton, Ohio

d. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

☐ Yes ☒ No

e. Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

☐ Yes ☐ No

f. Does notification contain the following?

| | | |
|--|------------------------------|-----------------------------|
| EPA Hazardous waste number(s) | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Applicable treatment standards | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Manifest number | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Waste analysis data, if available | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Certification that the waste meets treatment standards | <input type="checkbox"/> Yes | <input type="checkbox"/> No |

Identify off-site land disposal facilities: _____

g. Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?

☐ Yes ☒ No ☐ NA

h. If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

☐ Yes ☐ No

- i. If yes, does the notification contain the following information?

EPA Hazardous waste number ☐ Yes ☐ No

The corresponding treatment standards and all applicable prohibitions ☐ Yes ☐ No

Manifest number ☐ Yes ☐ No

Waste analysis data, if available ☐ Yes ☐ No

Date the waste is subject to the prohibitions ☐ Yes ☐ No

- j. Does the generator retain copies of all notices and certifications for a period of 5 years?

☐ Yes ☐ No

D. Demonstration and Certification -- "Soft Hammer" Wastes

- a. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [2683(a)(1)]?

☐ Yes ☐ No

- b. Has the generator submitted to the Regional Administration a demonstration and certification containing the following information to document its efforts to locate practically available treatment:

A list of facilities and facility officials contacted?

☐ Yes ☐ No

Addresses

☐ Yes ☐ No

Telephone Numbers

☐ Yes ☐ No

Contact dates

☐ Yes ☐ No

Attach a copy of the demonstration and certification

- c. If the generator has determined that there is no practically available treatment for its wastes, has it sent documentation to EPA demonstrating why it was not able to obtain treatment or recovery for the waste?

☐ Yes ☐ No

If yes, attach a copy of written discussion.

d. Does the generator ship his waste off-site for treatment?

____ Yes ____ No

Describe the type of treatment and treatment facilities _____

e. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

____ Yes ____ No

f. Does the generator provide certification with each subsequent shipment of wastes?

____ Yes ____ No

g. Does the generator provide the following notification to the receiving facility with each shipment of waste?

(i) EPA Hazardous waste number ____ Yes ____ No

(ii) Manifest number ____ Yes ____ No

(iii) Waste analysis data,
if available ____ Yes ____ No

h. Does the generator retain copies of all notices, demonstrations, and certifications for a period of 5 years?

____ Yes ____ No

E. Treatment Using RCRA 264/265 Exempt Units or Processes

(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

____ Yes ____ No

If yes, list types of waste treatment units and processes:

APPENDIX B
TREATMENT STANDARDS FOR F-SOLVENTS

| F001-F005 SPENT SOLVENTS | CONCENTRATION (IN MG/L) | |
|---|-------------------------|--------------|
| | WASTEWATERS | OTHER WASTES |
| Acetone | 0.05 | 0.59 |
| N-butyl | 5.0 | 5.0 |
| Carbon disulfide | 1.05 | 4.81 |
| Carbon tetrachloride | .05 | .96 |
| Chlorobenzene | .15 | .05 |
| Cresols (and cresylic acid) | 2.32 | .75 |
| Cyclohexanone | .125 | .75 |
| 1,2-dichlorobenzene | .65 | .125 |
| Ethyl acetate | .05 | .75 |
| Ethyl benzene | .05 | .053 |
| Ethyl ether | .05 | .75 |
| Isobutanol | 5.0 | 5.0 |
| Methanol | .25 | .75 |
| Methylene chloride | .20 | .96 |
| Methylene chloride (from the pharmaceutical industry) | 0.44 | .96 |
| Methyl ethyl ketone | 0.05 | 0.75 |
| Methyl isobutyl ketone | 0.05 | .33 |
| Nitrobenzene | 0.66 | 0.125 |
| Pyridine | 1.12 | 0.33 |
| Tetrachloroethylene | 0.079 | 0.05 |
| Toluene | 1.12 | 0.33 |
| 1,1,1-Trichloroethane | 1.05 | 0.41 |
| 1,2,2-Trichloro 1,2,2-trifluoroethane | 1.05 | 0.96 |
| Trichloroethylene | 0.062 | 0.091 |
| Trichlorofluoromethane | 0.05 | 0.96 |
| Xylene | 0.05 | 0.15 |

2/23/89 9:30 AM
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

HWFAB # N/A

GENERAL INFORMATION

U.S. EPA I.D. # OH 045-205-42

Facility: EKCO Housewares, Inc. Address: 359 State Ave., N.W. City: Massillon
State: Ohio Zip Code: 44648 County: STARK Telephone: (216) 832-5026

INSPECTION PARTICIPANT(S)

| (Name) | (Title) | (Telephone) |
|---------------------------|-----------------------------|-----------------------|
| 1. <u>Tom Marcovechio</u> | <u>Asst. Plant Engineer</u> | <u>(216) 832-5026</u> |
| 2. <u>Tom Shingleton</u> | <u>Plant Manager</u> | <u>(216) 832-5026</u> |
| 3. _____ | _____ | _____ |

INSPECTOR(S)

| | | |
|---------------------------|--------------------------------|-----------------------|
| 1. <u>Susan McCauslin</u> | <u>Environmental Scientist</u> | <u>(216) 425-9171</u> |
| 2. _____ | _____ | _____ |
| 3. _____ | _____ | _____ |

INSTALLATION ACTIVITY

Mark One

If the site is a TSDF, check the boxes indicating which areas were reviewed.

☐ Generator only (G)

☒ General Facility Standards, Preparedness and Prevention, Contingency and Emergency Manifests/Records/Reporting, Closure

☐ Waste Piles S03

☐ Transporter (T)

☐ Land Treatment D81

☐ TSDF only

☒ Containers S01

☐ Landfills D80

☐ G-T

☐ Tanks S02/T01

☐ Chemical/Physical/Biological T04

☒ G-TSDF

☒ Surface Impoundments S04/T02

☐ Groundwater Monitoring

☐ T-TSDF

☐ Incineration/Thermal Treatment

☐ Post-Closure

☐ G-T-TSDF

RCRA INTERIM STATUS INSPECTION FORM

| | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|---|------------|-----------|------------|-----------------|
| 1. Has the facility submitted a Part A to Ohio? | — | ✓ | — | — |
| 2. If "yes", is it complete and accurate? | — | — | ✓ | — |
| 3. Has the facility submitted a Part B? | — | — | ✓ | — |
| 4. Was advance notice of the inspection given? If so, how far in advance? | ✓ | — | — | 1 week |

IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

REMARKS, GENERAL INFORMATION

Include a brief description of site activity and waste handling.

Manufacture tin-coated bakeware, cleaning and coating of bakeware.

Wastes produced: F001, F005

Note: The facility's compliance with Groundwater requirements and financial requirements was not reviewed as part of this inspection.

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 262 (OAC 3745-52) GENERATOR REQUIREMENTS

| | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|---|------------|-----------|------------|-----------------|
| 1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11. [3745-52-11(D)] | ✓ | — | — | — |
| 2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 [3745-51-04] (statutory exclusions) or Section 261.6 [3745-51-06(A)(1)] (recycle/reuse)? | ✓ | — | — | #1 |
| 3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) [3745-65-01] or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10) [3745-65-01] | — | ✓ | — | — |
| 4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest: | | | | |
| a) The manifest form used contains all of the information required by Section 262.21(a) and (b) [3745-52-21] and the minimum number of copies required by Section 262.22 [3745-52-22]. | ✓ | — | — | — |
| b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20 [3745-52-20(B)(C)(D)]. | ✓ | — | — | — |
| c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23 [3745-52-23(A)(1 and 2)]. | ✓ | — | — | — |
| d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a)(b) [3745-52-42]. | — | — | ✓ | — |
| e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 [3745-52-40]. (262.40(a)) [3745-52-40(a)] | ✓ | — | — | — |

RCRA INTERIM STATUS INSPECTION FORM

| | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|--|------------|-----------|------------|-----------------|
| 5. The generator meets the following hazardous waste pre-transport requirements: | | | | |
| a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a)) [3745-52-30, 3745-52-31, 3745-52-32] | ✓ | — | — | — |
| b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b) [3745-52-32]. | ✓ | — | — | — |
| c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33 [3745-52-33]. | ✓ | — | — | — |
| 6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50 [3745-52-50] | — | — | ✓ | — |
| 7. If the generator elects to store hazardous waste on-site in <u>containers</u> or <u>tanks</u> for <u>90 days</u> or less without a RCRA storage permit as provided under Section 262.34 [3745-52-34], the following requirements with respect to such storage are met: | | | | |
| a) The containers are clearly marked with the words "Hazardous Waste". | ✓ | — | — | — |
| b) The date that accumulation began is clearly marked on each container. | ✓ | — | — | — |
| 8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) [3745-65-16(A)(B)(C)] including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (Section 262.34) [3745-52-34(A)(4)] | ✓ | — | — | — |
| 9. The generator keeps all of the records required by Section 265.16(d)(e) [3745-65-16(D)(E)] including written job titles, job descriptions and documented employee training records (Section 262.34) [3745-52-34(A)(4)]. | ✓ | — | — | — |

RCRA INTERIM STATUS INSPECTION FORM

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265 [3745-65], SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, GENERATOR REQUIREMENTS

waste TCE is recycled through a distillation unit.

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 265 (OAC 3745-65-et seq.) GENERAL INTERIM STATUS REQUIREMENTS AND TSD REQUIREMENTS

Yes No N/A Remark #

Subpart B: General Facility Standards

1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a) [3745-65-13(A)(1)]
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. (Section 265.13(b)) [3745-65-13(B)]
3. a) Would physical contact with the waste structures or equipment injure unknowing/unauthorized persons or livestock entering the facility? (265.14(a)(1)) [3745-65-14(A)(1)]
- b) Would disturbance of the waste cause a violation of the hazardous waste regulations? (265.14(a)(2)) [3745-65-14(A)(2)]

| | | | |
|--------|---|---|---|
| ✓ — | — | — | — |
| ✓ — | — | — | — |
| ✓ — | — | — | — |
| ✓ — | — | — | — |

IF BOTH 3a AND 3b ARE "NO", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".

4. The facility has -
 - a) A 24-hour surveillance system, or
 - b) An artificial or natural barrier and a means to control entry at all times (265.14(b)(2)). [3745-65-14(B)(2)(a and b)]
5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265-14(c)) [3745-65-14(C)]

| | | | |
|--------|---|---|---|
| ✓ — | — | — | — |
| ✓ — | — | — | — |
| ✓ — | — | — | — |

RCRA INTERIM STATUS INSPECTION FORM

| | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|---|------------|-----------|------------|-----------------|
| 6. a) The operator has developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15) [3745-65-15] | ✓ | — | — | — |
| b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4)) [3745-65-15(B)(4)] | ✓ | — | — | — |
| 7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. [3745-65-16(A)(B)(C)] | ✓ | — | — | — |
| 8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records. [3745-65-16(D)(E)] | ✓ | — | — | — |
| 9. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements: (Section 265.17) [3745-65-17] | | | | |
| a) Protection from sources of ignition. | ✓ | — | — | — |
| b) Physical separation of incompatible waste materials. | — | — | ✓ | — |
| c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled. | ✓ | — | — | — |
| d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b). [3745-65-17(B)] | — | — | ✓ | — |

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart C: Preparedness and Prevention

- | | | | | |
|--|-----------|-----------------------|-----------|-----------|
| 1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31] | <u> </u> | <u> </u> ✓ <u> </u> | <u> </u> | <u> </u> |
| 2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)] | | | | |
| a) Internal alarm system. | ✓ | <u> </u> | <u> </u> | <u> </u> |
| b) Access to telephone, radio or other device for summoning emergency assistance. | ✓ | <u> </u> | <u> </u> | <u> </u> |
| c) Portable fire control equipment. | ✓ | <u> </u> | <u> </u> | <u> </u> |
| d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers. | ✓ | <u> </u> | <u> </u> | <u> </u> |
| 3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33] | ✓ | <u> </u> | <u> </u> | <u> </u> |
| 4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34] | ✓ | <u> </u> | <u> </u> | <u> </u> |
| 5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) [3745-65-35] | ✓ | <u> </u> | <u> </u> | <u> </u> |
| 6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)] | ✓ | <u> </u> | <u> </u> | <u> </u> |
| 7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)] | <u> </u> | <u> </u> | ✓ | <u> </u> |

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(B)(C)(D)(E)] and contains the following components:
 - a) Actions to be taken by personnel in the event of an emergency incident. ☒ ☐ ☐ ☐
 - b) Arrangements or agreements with local or state emergency authorities. ☒ ☐ ☐ ☐
 - c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator. ☒ ☐ ☐ ☐
 - d) A list of all emergency equipment including location, physical description and outline of capabilities. ☒ ☐ ☐ ☐
 - e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)] ☒ ☐ ☐ ☐
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)] ☒ ☐ ☐ ☐
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) [3745-65-54] ☒ ☐ ☐ ☐
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55] ☒ ☐ ☐ ☐
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-J)] ☐ ☐ ☒ ☐

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1. The operator maintains a written operating record at his facility as required by Section 265.73 [3745-65-73(A)] which contains the following information:

- a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment, storage or disposal. (265.73(b)(1)) [3745-65-73(B)(1)]
- b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).
- c) The estimated (or actual) weight, volume or density of the waste material(s).
- d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).
- e) The present physical location of each hazardous waste within the facility.
- f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2)) [3745-65-73(B)(2)]
- g) Records of any waste analyses and trial tests required to be performed.
- h) Records of the inspections required under Section 265.15 [3745.65.14] (General Inspection Requirements - Subpart B).
- i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6). [3745-65-73(B)(6)]
- j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.

| | | | |
|---|---|---|---|
| ✓ | — | — | — |
| ✓ | — | — | — |
| ✓ | — | — | — |
| ✓ | — | — | — |
| ✓ | — | — | — |
| — | — | ✓ | — |
| ✓ | — | — | — |
| ✓ | — | — | — |
| ✓ | — | — | — |

RCRA INTERIM STATUS INSPECTION FORM

| | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|--|-------------------------------------|--------------------------|-------------------------------------|-----------------|
| 2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75. [3745-65-75] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO <u>ONLY</u> OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES. | | | | |
| 3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71) [3745-65-71(A)] | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b)) [3745-65-71(B)] | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) [3745-65-72(A)] are noted in writing on the manifest document. (265.71(a)(2)) [3745-65-71(A)(2)] | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| 4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) <u>or</u> the operator has submitted the required information to the Regional Administrator/Director. [3745-65-72(B)] | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| 5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days. [3745-65-76(A)] | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

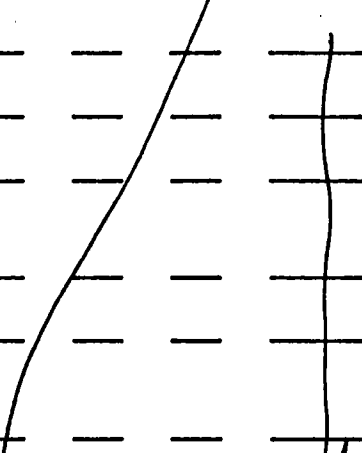
Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

- | | | | | |
|---|---|---|---|---|
| 1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112) [3745-66-12] | ✓ | — | — | — |
| a) A description of how and when the facility will be closed. (265.112(a)(1)) [3745-66-12(A)(1)] | ✓ | — | — | — |
| b) A description of how any of the <u>applicable</u> closure requirements in other Subparts of Section 265 [3745-66] (Tanks, Surface Impoundments, Landfill, etc.) will be carried out. | ✓ | — | — | — |
| c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.) | ✓ | — | — | — |
| d) A description of steps taken to decontaminate facility equipment. | ✓ | — | — | — |
| e) The year closure is expected to begin and a schedule for the various phases of closure. | ✓ | — | — | — |
| 2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates. (265.112(4)(B)) [3745-66-12(B)] | — | — | ✓ | — |
| 3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process. (265.112(4)(C)) [3745-66-12(C)] | ✓ | — | — | — |

Subpart H: Financial Requirements

#2



1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143) [3745-66-43]
 - a) A closure trust fund, or
 - b) A surety bond, or
 - c) A closure letter of credit, or
 - d) A combination of financial mechanisms.
2. A written cost estimate for closure of the facility (as specified in the closure plan) is available. How much is it?
3. When was the most recent estimate made?
4. A written cost estimate for post closure care of the facility (if applicable) is available. How much is it?
5. When was the most recent estimate made?

REMARKS, GENERAL INTERIM STATUS REQUIREMENTS

Financial requirements compliance not reviewed.

RCRA INTERIM STATUS INSPECTION FORM

Subpart I: Management of Containers

| | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|---|-------------------------------------|--------------------------|--------------------------|----------------------|
| 1. Hazardous wastes are stored in containers which are: | | | | |
| a) Closed (265.173) [3745-66-73(A)] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="text"/> |
| b) In good physical condition (265.171) [3745-66-71] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="text"/> |
| c) Compatible with the wastes stored in them (265.172) [3745-66-72] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="text"/> |
| 2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a)) [3745-66-73(A)] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="text"/> |
| 3. Hazardous waste containers are stored, handled and opened in a manner which prevents container rupture or leakage. (265.173(b)) [3745-66-73(B)] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="text"/> |
| 4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174) [3745-66-74] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="text"/> |
| 5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176) [3745-66-76] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="text"/> |
| 6. Containers holding hazardous wastes are stored separate from other materials which may interact with the waste in a hazardous manner. (265.177(c)) [3745-66-77(C)] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="text"/> |

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart K: Surface Impoundments

1. The Surface Impoundment is designed to operate with at least 2 feet (60 cm.) of freeboard and has a structural containment system adequate to contain the waste material. (265.222) [3745-67-22]
2. Earthen structural containment systems are equipped with protective cover such as grass, shale or rock to minimize erosion from wind and water. (265.22) [3745-67-23]
3. The level of freeboard in the Surface Impoundment is inspected at least once each operating day, the structural containment system is inspected at least once per week and all such inspections are documented. (265.226) [3745-67-26]
4. Whenever Surface Impoundments are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the Surface Impoundment, the facility has insured the safety of such changes. (265.225) [3745-67-25]
5. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in Surface Impoundments the facility has insured the safety of the operation by treating the waste immediately after placement in the Surface Impoundment so that it is no longer Ignitable or Reactive. (265.229 and 265.17(b)) [3745-67-29 and 3745-65-17]
6. Incompatible materials are never placed in the same Surface Impoundment unless it is done in compliance with the safety requirements of Section 265.17(b) [3745-65-17]. (265.230) [3745-67-30]

| | | | |
|---|---|---|---|
| ✓ | — | — | — |
| ✓ | — | — | — |
| ✓ | — | — | — |
| — | — | ✓ | — |
| — | — | ✓ | — |
| — | — | ✓ | — |

NOTE: IF THE OPERATOR ELECTS NOT TO EXEMPT THE SURFACE IMPOUNDMENT FROM FURTHER REGULATIONS BY REMOVING ALL WASTE MATERIALS, THE SURFACE IMPOUNDMENT IS SUBJECT TO THE POST-CLOSURE CARE AND GROUNDWATER MONITORING REQUIREMENTS SPECIFIED IN SUBPART G FOR DISPOSAL FACILITIES AND SUBPART N, SECTION 265.310 [3745-68-10] FOR LANDFILLS. (265.228) [3745-67-28(C)]

24 AUGUST 87 12:00 A.M.
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

HWFAB # NA

GENERAL INFORMATION

U.S. EPA I.D. # OHIO 015-205-424

Facility: ECKO HOUSEWARES INC. Address: 359 STATE AVE. N.W. City: MASSACHUSETTS
State: OHIO Zip Code: 44648 County: STARK Telephone: (216) 832-5026

INSPECTION PARTICIPANT(S)

| | (Name) | (Title) | (Telephone) |
|----|------------------------|---------------------------|-----------------------|
| 1. | <u>SIM EPPS</u> | <u>CHIEF ENGINEER</u> | <u>(216) 832-5026</u> |
| 2. | <u>TOM MARCOTECHIO</u> | <u>MECH. ENGINEER</u> | <u>(216) 832-5026</u> |
| 3. | <u>JOEF RICHARDSON</u> | <u>DRAFTSMAN ENGINEER</u> | <u>(216) 832-5026</u> |

INSPECTOR(S)

| | | | |
|----|--------------------|--------------------------------|-----------------------|
| 1. | <u>KRIS COOPER</u> | <u>ENVIRONMENTAL SCIENTIST</u> | <u>(216) 425-9171</u> |
| 2. | <u>TRACY SABOL</u> | <u>ENVIRONMENTAL ENGINEER</u> | <u>(216) 425-9171</u> |
| 3. | | | |

INSTALLATION ACTIVITY

Mark One

If the site is a TSDF, check the boxes indicating which areas were reviewed.

☐ Generator only (G)
☐ Transporter (T)
☐ TSDF only
☐ G-T
☒ G-TSDF
☐ T-TSDF
☐ G-T-TSDF

☒ General Facility Standards, Preparedness
and Prevention, Contingency and Emergency
Manifests/Records/Reporting, Closure
☒ Containers S01
☐ Tanks S02/T01
☒ Surface Impoundments S04/T02
☐ Incineration/Thermal Treatment

☐ Waste Piles S03
☐ Land Treatment D01
☐ Landfills D02
☐ Chemical/Physical/
Biological T04
☒ Groundwater Monitoring
☐ Post-Closure

RCRA INTERIM STATUS INSPECTION FORM

1. Has the facility submitted a Part A to Ohio?
2. If "yes", is it complete and accurate?
3. Has the facility submitted a Part B?
4. Was advance notice of the inspection given? If so, how far in advance?

| <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|------------|-----------|------------|-----------------|
| — | ✓ | — | — |
| — | — | ✓ | — |
| — | — | ✓ | — |
| ✓ | — | — | — |

1 WEEK
TO TURN
SHEWORTH

IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

REMARKS, GENERAL INFORMATION

Include a brief description of site activity and waste handling.

MANUFACTURE TIN COATED BAKEWARE.

DEGREASER STILL BOTTOM WASTES - F001, D007, D009

SILICON WASTES (WASTE PAINT) - F005 (SPEUT NON-ALLOYEATED STEEL)

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 262 (OAC 3745-52) GENERATOR REQUIREMENTS

| | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|--|-------------------------------------|-------------------------------------|--------------------------|---------------------------------------|
| 1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11. [3745-52-11(D)] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 [3745-51-04] (statutory exclusions) or Section 261.6 [3745-51-06(A)(1)] (recycle/reuse)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <u>TRICHLOR</u> <u>(2-3 drums)</u> |
| 3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) [3745-65-01] or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10)) [3745-65-01] | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest: | | | | |
| a) The manifest form used contains all of the information required by Section 262.21(a) and (b) [3745-52-21] and the minimum number of copies required by Section 262.22 [3745-52-22]. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20 [3745-52-20(B)(C)(D)]. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23 [3745-52-23(A)(1 and 2)]. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a)(b) [3745-52-42]. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 [3745-52-40]. (262.40(a)) [3745-52-40(a)] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

RCRA INTERIM STATUS INSPECTION FORM

| | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|--|-------------------------------------|-------------------------------------|-------------------------------------|---|
| 5. The generator meets the following hazardous waste pre-transport requirements: | | | | |
| a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a)) [3745-52-30, 3745-52-31, 3745-52-32] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) <u>or less</u> is affixed with a completed hazardous waste label as required by Section 262.32(b) [3745-52-32]. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33 [3745-52-33]. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50 [3745-52-50] | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| 7. If the generator elects to store hazardous waste on-site in <u>containers</u> or <u>tanks</u> for <u>90 days</u> or less without a RCRA storage permit as provided under Section 262.34 [3745-52-34], the following requirements with respect to such storage are met: | | | | |
| a) The containers are clearly marked with the words "Hazardous Waste". | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| b) The date that accumulation began is clearly marked on each container. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) [3745-65-16(A)(B)(C)] including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (Section 262.34) [3745-52-34(A)(4)] | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | NEED TO PROVIDE ANNUAL TRAINING AND DOCUMENTATION |
| 9. The generator keeps all of the records required by Section 265.16(d)(e) [3745-65-16(D)(E)] including written job titles, job descriptions and documented employee training records (Section 262.34) [3745-52-34(A)(4)]. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | NEED TO PROVIDE JOB TITLES, JOB DESCRIPTIONS, |

RCRA INTERIM STATUS INSPECTION FORM

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265 [3745-65], SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, GENERATOR REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 265 (OAC 3745-65-et seq.) GENERAL INTERIM STATUS REQUIREMENTS AND TSD REQUIREMENTS

Subpart B: General Facility Standards

1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a) [3745-65-13(A)(1)]

Yes No N/A Remark #

— ✓ — A PLAN NEEDS
TO BE DEVELOPED
TO COMPLY WITH
HITTABLE RULES.

2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. (Section 265.13(b)) [3745-65-13(B)]

— ✓ —

3. a) Would physical contact with the waste structures or equipment injure unknowing/unauthorized persons or livestock entering the facility? (265.14(a)(1)) [3745-65-14(A)(1)]

✓ — —

b) Would disturbance of the waste cause a violation of the hazardous waste regulations? (265.14(a)(2)) [3745-65-14(A)(2)]

✓ — —

IF BOTH 3a AND 3b ARE "NO", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".

4. The facility has -

a) A 24-hour surveillance system, or

✓ — — GUARD SYSTEM

b) An artificial or natural barrier and a means to control entry at all times (265.14(b)(2)). [3745-65-14(B)(2)(a and b)]

✓ — — IMPROVEMENT
FENCED.
DRAIN STORAGE
FENCED.

5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265-14(c)) [3745-65-14(C)]

— ✓ —

RCRA INTERIM STATUS INSPECTION FORM

| | Yes | No | N/A | Remark # |
|---|-------------------------------------|-------------------------------------|-------------------------------------|--|
| 6. a) The operator has developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15) [3745-65-15] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | FUR DRUM SERVICE ONLY. |
| b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4)) [3745-65-15(B)(4)] | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. [3745-65-16(A)(B)(C)] | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | SEE PREVIOUS GENERATION COMMENTS |
| 8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records. [3745-65-16(D)(E)] | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 9. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements: (Section 265.17) [3745-65-17] | | | | WASTE SOLVENT STORAGE AREA ONLY. |
| a) Protection from sources of ignition. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | NO SMOKING SIGNS POSTED |
| b) Physical separation of incompatible waste materials. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | NEED TO POST NO SMOKING SIGN AT DRUM STORAGE AREA |
| d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b). [3745-65-17(B)] | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31]
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)]
 - a) Internal alarm system.
 - b) Access to telephone, radio or other device for summoning emergency assistance.
 - c) Portable fire control equipment.
 - d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers.
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33]
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34]
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement of emergency or spill control equipment is maintained. (265.35) [3745-65-35]
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)]
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)]

| | | | |
|-----------------------|-----------------------|-----------------------|---|
| <u> </u> | <u> </u> ✓ <u> </u> | <u> </u> | <u> </u> |
| <u> </u> ✓ <u> </u> | <u> </u> | <u> </u> | <u>(GENERAL ALARM)</u> <u>SPEAKER SYSTEM</u> <u>TELEPHONE RAC</u> |
| <u> </u> ✓ <u> </u> | <u> </u> | <u> </u> | <u> </u> |
| <u> </u> ✓ <u> </u> | <u> </u> | <u> </u> | <u>SPRINKLER SYST.</u> <u>IN CITY WATER</u> |
| <u> </u> ✓ <u> </u> | <u> </u> | <u> </u> | <u> </u> |
| <u> </u> ✓ <u> </u> | <u> </u> | <u> </u> | <u> </u> |
| <u> </u> | <u> </u> ✓ <u> </u> | <u> </u> | <u> </u> |
| <u> </u> | <u> </u> | <u> </u> ✓ <u> </u> | <u> </u> |

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(B)(C)(D)(E)] and contains the following components:
 - a) Actions to be taken by personnel in the event of an emergency incident. ✓
 - b) Arrangements or agreements with local or state emergency authorities. ✓
 - c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator. ✓
 - d) A list of all emergency equipment including location, physical description and outline of capabilities. ✓
 - e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)] ✓
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)] ✓
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) [3745-65-54] ✓
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55] ✓
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-J)] ✓

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1. The operator maintains a written operating record at his facility as required by Section 265.73 [3745-65-73(A)] which contains the following information:

- Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment, storage or disposal. (265.73(b)(1)) [3745-65-73(B)(1)]
- Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).
- The estimated (or actual) weight, volume or density of the waste material(s).
- A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).
- The present physical location of each hazardous waste within the facility.
- FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2)) [3745-65-73(B)(2)]
- Records of any waste analyses and trial tests required to be performed.
- Records of the inspections required under Section 265.15 [3745.65.14] (General Inspection Requirements - Subpart B).
- Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6). [3745-65-73(B)(6)]
- Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.

| Yes | No | N/A | Remark # |
|-----|----|-----|--------------------|
| ✓ | | | |
| ✓ | | | |
| ✓ | | | |
| ✓ | | | |
| ✓ | | | |
| | | ✓ | |
| ✓ | | | DRUMS ONLY |
| ✓ | | | G. WATZ RECORDS |
| ✓ | | | |

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75. [3745-65-75]

— — ✓ —

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71) [3745-65-71(A)]

— — — ✓ —

- a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b)) [3745-65-71(B)]

— — — ✓ —

- b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) [3745-65-72(A)] are noted in writing on the manifest document. (265.71(a)(2)) [3745-65-71(A)(2)]

— — — ✓ —

4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) or the operator has submitted the required information to the Regional Administrator/Director. [3745-65-72(B)]

— — — ✓ —

5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days. [3745-65-76(A)]

— — — ✓ —

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112) [3745-66-12]
 - a) A description of how and when the facility will be closed. (265.112(a)(1)) [3745-66-12(A)(1)]
 - b) A description of how any of the applicable closure requirements in other Subparts of Section 265 [3745-66] (Tanks, Surface Impoundments, Landfill, etc.) will be carried out.
 - c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.)
 - d) A description of steps taken to decontaminate facility equipment.
 - e) The year closure is expected to begin and a schedule for the various phases of closure.
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates. (265.112(4)(B)) [3745-66-12(B)]
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process. (265.112(4)(C)) [3745-66-12(C)]

INFORMATION IN
 THIS SECTION
 COULD NOT BE
 ADEQUATELY DETER-
 MINED DURING
 THIS INSPECTION
 FACILITY WILL
 BE ASKED TO
 DOCUMENT COM-
 PLIANCE WITH
 THIS SECTION.

RCRA INTERIM STATUS INSPECTION FORM

Subpart H: Financial Requirements

1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143) [3745-66-43]
 - a) A closure trust fund, or
 - b) A surety bond, or
 - c) A closure letter of credit, or
 - d) A combination of financial mechanisms.
2. A written cost estimate for closure of the facility (as specified in the closure plan) is available. How much is it?
3. When was the most recent estimate made?
4. A written cost estimate for post closure care of the facility (if applicable) is available. How much is it?
5. When was the most recent estimate made?

Yes No N/A Remark #

INFORMATION IN
THIS SECTION CAN
NOT BE NEGLIGENTLY
DETERMINED AT
THIS TIME, FACIL-
ITY WILL BE
ASKED TO D.C.
URGENT COMPLE-
WITH THIS
SECTION.

REMARKS, GENERAL INTERIM STATUS REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

Subpart I: Management of Containers

| | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|---|-------------------------------------|-------------------------------------|-------------------------------------|---------------------------------|
| 1. Hazardous wastes are stored in containers which are: | | | | |
| a) Closed (265.173) [3745-66-73(A)] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| b) In good physical condition (265.171) [3745-66-71] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| c) Compatible with the wastes stored in them (265.172) [3745-66-72] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a)) [3745-66-73(A)] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | ALWAYS CLOSE WHEN IN STORAGE |
| 3. Hazardous waste containers are stored, handled and opened in a manner which prevents container rupture or leakage. (265.173(b)) [3745-66-73(B)] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174) [3745-66-74] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176) [3745-66-76] | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | NEED TO POST "NO SMOKING" SIGN. |
| 6. Containers holding hazardous wastes are stored separate from other materials which may interact with the waste in a hazardous manner. (265.177(c)) [3745-66-77(C)] | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart K: Surface Impoundments

1. The Surface Impoundment is designed to operate with at least 2 feet (60 cm.) of freeboard and has a structural containment system adequate to contain the waste material. (265.222) [3745-67-22]
2. Earthen structural containment systems are equipped with protective cover such as grass, shale or rock to minimize erosion from wind and water. (265.22) [3745-67-23]
3. The level of freeboard in the Surface Impoundment is inspected at least once each operating day, the structural containment system is inspected at least once per week and all such inspections are documented. (265.226) [3745-67-26]
4. Whenever Surface Impoundments are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the Surface Impoundment, the facility has insured the safety of such changes. (265.225) [3745-67-25]
5. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in Surface Impoundments the facility has insured the safety of the operation by treating the waste immediately after placement in the Surface Impoundment so that it is no longer Ignitable or Reactive. (265.229 and 265.17(b)) [3745-67-29 and 3745-65-17]
6. Incompatible materials are never placed in the same Surface Impoundment unless it is done in compliance with the safety requirements of Section 265.17(b) [3745-65-17]. (265.230) [3745-67-30]

| | | | |
|---|---|---|--|
| — | — | ✓ | NOT OPERATING DRY SURFACE |
| ✓ | — | — | |
| — | ✓ | — | FREE BOARD LEVEL N/A SINCE IMPOUND- MENT NOT RECEIVING WASTE |
| — | — | ✓ | |
| — | — | ✓ | |
| — | — | ✓ | |

NOTE: IF THE OPERATOR ELECTS NOT TO EXEMPT THE SURFACE IMPOUNDMENT FROM FURTHER REGULATIONS BY REMOVING ALL WASTE MATERIALS, THE SURFACE IMPOUNDMENT IS SUBJECT TO THE POST-CLOSURE CARE AND GROUNDWATER MONITORING REQUIREMENTS SPECIFIED IN SUBPART G FOR DISPOSAL FACILITIES AND SUBPART N, SECTION 265.310 [3745-68-10] FOR LANDFILLS. (265.228) [3745-67-28(c)]

RCRA INTERIM STATUS INSPECTION FORM

SUBPART F: GROUND WATER MONITORING

Type of facility: (check appropriately)

- a) surface impoundment
- b) landfill
- c) land treatment facility

NOTE: UNDER INTERIM STATUS STANDARDS A WASTE PILE IS NOT SUBJECT TO GROUND WATER MONITORING REQUIREMENTS. PLEASE NOTE, HOWEVER, THAT IF ANY HAZARDOUS WASTE FROM A WASTE PILE IS LEFT IN PLACE AT CLOSURE, THE "WASTE PILE" BECOMES A "LANDFILL" AND MUST MEET POST-CLOSURE RULES APPLICABLE TO LANDFILLS.

Ground Water Monitoring Program

1. Was the ground water monitoring program reviewed prior to site visit?
If "No",
 - a) Was the ground water program reviewed at the facility prior to site inspection?
2. Has a ground water monitoring program (capable of determining the facility's impact on the quality of ground water in the uppermost aquifer underlying the facility) been implemented?
265.90(a) [3745-65-90(A)]
3. Has at least one monitoring well been installed in the uppermost aquifer hydraulically upgradient from the limit of the waste management area? 265.91(a)(1) [3745-65-91(A)(1)]
 - a) Are ground water samples from the uppermost aquifer, representative of background ground water quality and not affected by the facility (as ensured by proper well number, location and depths)?

Yes No Unknown Waived

☒ ☐ ☐ ☐
 INFORMATION IN
 THIS SECTION CAN
 NOT BE ADEQUATELY
 DETERMINED AT
 THIS TIME. FACILITY
 WILL BE ASKED TO
 DOCUMENT COMPLI-
 ANCE TO SUBPART
 F, GROUNDWATER
 MONITORING FOR
 SURFACE IMPOUND-
 MENT.

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| | <u>Yes</u> | <u>No</u> | <u>Unknown</u> | <u>Waived</u> |
|---|------------|-----------|----------------|---------------|
| 4. Have at least three monitoring wells been installed hydraulically downgradient at the limit of the waste handling or management area? 265.91(a)(2) [3745-65-91(A)(2)] | — | — | | |
| a) Do well number, locations and depths ensure prompt detection of any statistically significant amounts of hazardous waste or hazardous waste constituents that migrate from the waste management area to the uppermost aquifer? | — | — | | |
| 5. Have the locations of the waste management areas been verified to conform with information in the ground water program? | — | — | — | |
| a) If the facility contains multiple waste management components, is each component adequately monitored? | — | — | | |
| 6. Do the numbers, locations, and depths of the ground water monitoring wells agree with the data in the ground water monitoring system program? If "No", explain discrepancies. | — | — | — | |
| 7. Well completion details. 265.91(c) [3745-65-91(C)] | | | | |
| a) Are wells properly cased? | — | — | — | |
| b) Are wells screened (perforated) and packed where necessary to enable sampling at appropriate depths? | — | — | — | |
| c) Are annular spaces properly sealed to prevent contamination of ground water? | — | — | — | |

... sampling and analysis plan been developed?
265.92(a) [3745-65-92(A)]

a) Has it been followed?

b) Is the plan kept at the facility?

c) Does the plan include procedures and techniques for:

1) Sample collection?

2) Sample preservation?

3) Sample shipment?

4) Analytical procedures?

5) Chain of custody control?

9. Are the required parameters in ground water samples being tested quarterly for the first year? 265.92(b) [3745-65-92(B)] and 265.92(c)(1) [3745-65-92(C)]

a) Are the ground water samples analyzed for the following:

1) Parameters characterizing the suitability of the ground water as a drinking water supply? 265.92(b)(1) [3745-65-92(B)(1)]

2) Parameters establishing ground water quality? 265.92(b)(2) [3745-65-92(B)(2)]

3) Parameters used as indicators of ground water contamination? 265.92(b)(2) [3745-65-92(B)(3)]

(1) For each indicator parameter are at least four replicate measurements obtained at each upgradient well for each sample obtained during the first year of monitoring? 265.92(c)(2) [3745-65-92(C)(2)]

Calculate the initial background
mean and variance of the respective parameter
concentrations or values obtained from the upgradient well(s)
during the first year? 265.92(c)(2) [3745-65-92(C)(2)]

b) For facilities which have completed first year ground water sampling
and analysis requirements:

1) Have samples been obtained and analyzed for the ground water
quality parameters at least annually? 265.92(d)(1) [3745-65-92(D)(1)]

2) Have samples been obtained and analyzed for the indicators of
ground water contamination at least semi-annually? (4 replicate
measurements per sample) 265.92(d)(2) [3745-65-92(D)(2)]

c) Were ground water surface elevations determined at each monitoring
well each time a sample was taken? 265.92(e) [3745-65-92(E)]

d) Were ground water surface elevations evaluated annually to determine whether
the monitoring wells are properly placed? 265.92(f) [3745-65-92(E)]

e) If it was determined that modification of the number, location or depth
of monitoring wells was necessary, was the system brought into compliance
with 265.91(a) [3745-65-91(A)]? 265.93(f) [3745-65-93(F)]

10. Has an outline of a ground water quality assessment program been
prepared? 265.93(a) [3745-65-93(A)]

a) Does it describe a program capable of determining:

1) Whether hazardous waste or hazardous waste constituents have
entered the ground water?

2) The rate and extent of migration of hazardous waste or
hazardous waste constituents in ground water?

3) Concentrations of hazardous waste or hazardous waste
constituents in ground water?

| | <u>Yes</u> | <u>No</u> | <u>Unknown</u> | <u>Waived</u> |
|---|------------|-----------|----------------|---------------|
| b) After the first year of monitoring, have at least four replicate measurements of each indicator parameter been obtained for samples taken for each well? 265.93(b) [3745-65-93(B)] | — | — | | |
| 1) Were the results compared with the initial background means from the upgradient well(s) determined during the first year? | — | — | | |
| (i) Was each well considered individually? | — | — | | |
| (ii) Was the Student's t-test used (at the 0.01 level of significance?) | — | — | | |
| 2) Was a significant increase (or pH decrease as well) found in the: | | | | |
| (i) Upgradient wells (If "Yes", Compliance Checklist A-2 must also be completed.) [3745-65-93(C)(1)] | — | — | | |
| (ii) Downgradient wells | — | — | | |
| If "Yes", owner or operator must obtain, split, and analyze additional samples from the wells where a significant difference was detected. If the difference is confirmed, the Director should be notified in writing within 7 days and a ground water assessment plan within 15 days. [3735-65-93(C)(2) and (D)(2)(3)] | | | | |
| 11. Have records been kept of analyses for parameters in 265.92(c) and (d) [3745-65-92(C) and (D)? 265.94(a)(1) [3745-65-94(A)(1)] | — | — | | |
| 12. Have records been kept of ground water surface elevations taken at the time of sampling for each well? 265.94(a)(1) [3745-65-94(A)(1)] | — | — | | |
| 13. Have records been kept of required elevations in 265.93(b) [3745-65-93(B)]? 265.94(a)(1) [3745-65-94(A)(1)] | — | — | | |
| 14. Have the following been submitted to the Director of the Ohio EPA: 265.94(a)(2) [3745-65-94(A)(2)] | | | | |
| a) Initial background concentrations of parameters listed in 265.92(b) [3745-65-92(B)] within 15 days after completing each quarterly analysis required during the first year? | — | — | | |

| | <u>Yes</u> | <u>No</u> | <u>Unknown</u> | <u>Waived</u> |
|--|------------|-----------|----------------|---------------|
| b) For each well, have any parameters whose concentrations or values have exceeded the maximum contaminant levels allowed in drinking water supplied been separately identified? | — | — | | |
| c) Annual reports including: [3745-65-94(A)(2)] | | | | |
| 1) Concentrations or values of parameters used as indicators of ground water contamination for each well along with required evaluations under 265.93(b) [3745-65-93(B)]? | — | — | | |
| 2) Any significant differences from initial background values in upgradient wells separately identified? | — | — | | |
| 3) Results of the evaluation of ground water surface elevations? | — | — | | |

Comments: Subpart F

M E M O R A N D U M

TO: Dave Sholtis, DSHWM, Central Office

Sept. 8, 1987

FROM: Kris Coder, DSHWM, NEDO *KC*.

SUBJECT: ECKO Housewares, Inc., Land Facility Inspection -
Compliance with Closure, Financial Requirements
and Ground Water Monitoring

This is to inform you that on the date of this facility's inspection (August 24, 1987) representatives of the facility refused to discuss the facility's closure plan for the surface impoundment and its compliance with financial requirements and groundwater monitoring due to the on-going litigation between the facility and U.S. EPA.

If you have any questions please advise me.

KC/sp

cc: File